

**RESPONSE TO COMMENTS
REGARDING
THE FEDERAL RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT
TO BE REISSUED TO DETREX CORPORATION
ILD 074 424 938
MELROSE PARK, ILLINOIS**

US EPA RECORDS CENTER REGION 5



1000078

INTRODUCTION

This response is issued pursuant to Title 40 of the Code of Federal Regulations (40 CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included in the administrative record. Comments were requested regarding the United States Environmental Protection Agency's (U.S. EPA) tentative determination to issue a RCRA permit to the Permittee.

The 45-day public comment period commenced on May 21, 2003, with a public notice in the Melrose Park Herald Newspaper. The termination date of this comment period was July 5, 2003. No written comments on the draft Federal permit were received.

Pertinent information and materials were available at the Melrose Park Public Library, 801 Broadway, Melrose Park, Illinois 60160.

NO COMMENTS WERE RECEIVED

CHANGES TO THE DRAFT PERMIT

(Note: All page numbers are referred to the draft federal permit.)

1. "Draft " and "*Draft March , 2003*" in the header were deleted from the draft permit, because such references are not needed in the final Federal permit.
2. Due to the recent organization change in Region 5, "Phyllis Reed, Acting Director" was replaced with "Margaret M. Guerriero, Acting Director".

DETERMINATION

Based on a full review of all relevant data provided to the U.S. EPA, the U.S. EPA has determined that the final permit contains such terms and conditions necessary to protect human health and the environment.

Response to Comments

Detrex

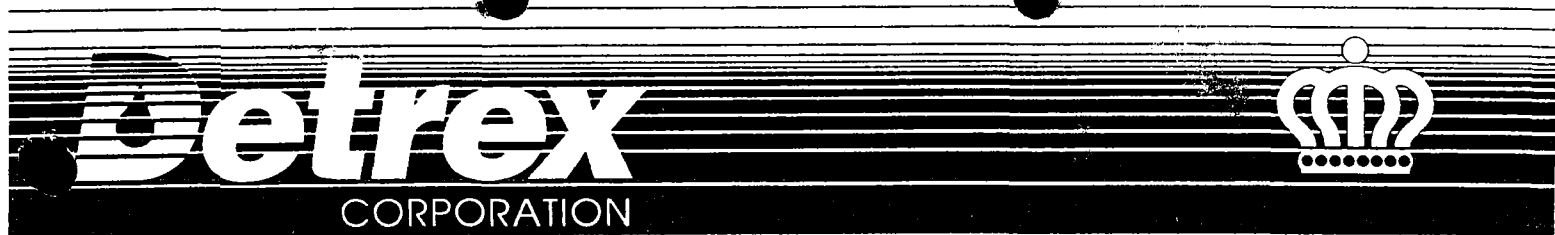
Jim Blough

Sept 30, 2003

WASTE MANAGEMENT BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
	MB 9/16				
TYPIST/ AUTHOR	TSP SECTION CHIEF	CA SECTION CHIEF	POL. PREV. & SPEC. INTIV SEC. CHIEF	WMB BRANCH CHIEF	WPTD DIVISION DIRECTOR
MB	MB 9/15			MB 9/24/03	MB 9/25/03

MB
9/17/03



P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (248) 358-5800 • FAX (248) 358-5803

November 18, 2002

To Whom It May Concern:

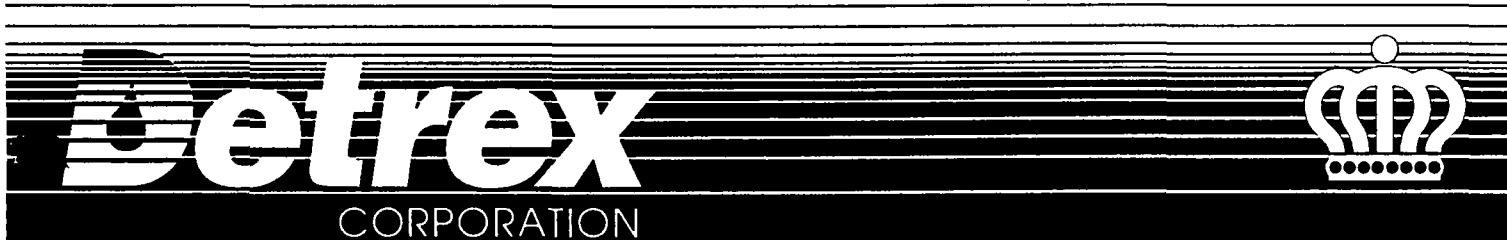
Notice of application for permit renewal
Detrex Corporation
2537 LeMoyne Ave.,
Melrose Park IL 60160

In accordance with 35 IAC 702.142 & 703.125, Detrex Corporation has submitted a Hazardous Waste Permit renewal application to the ILEPA on October 15, 2002. Detrex Corporation operates a hazardous waste storage facility; accepting and storing containerized hazardous wastes on site, prior to shipment to another licensed Treatment Storage and Disposal Facility. Changes to the existing permit focus on the type and size of containers accepted for storage.

The renewal application and supporting documents are available for examination and copying at the following locations: Melrose Park City Hall, Building & Zoning Department, 1000 North 25th Ave., Melrose Park, IL 60160 (hours 9am-5pm) and the Melrose Park Public Library, 801 Broadway, Melrose Park, IL (9am-9pm M-Th, 9am-6pm F, & 10am-5pm S). Each copy of the application will be updated as changes are made during the review process.

Anyone wishing to obtain additional information on the permit application, or to be added to the facility mailing list, should forward his or her inquiries/requests to Mr. David Craig (248-358-5800 ext. 131) or Mr. Stan Miles (317-842-2225) of Detrex Corporation, PO Box 5111, Southfield, MI 48086-5111. General information inquiries on the hazardous waste management permit program in Illinois, should be directed to:

- Ms. Mary Riegle (217-524-3329), ILEPA, Bureau of Land, 1021 North Grand Ave. East, PO Box 9276, Springfield, IL 62794-9276, or
- Mara McGinnis (217-524-3288), ILEPA, Bureau of Land, 1021 North Grand Ave. East, PO Box 9276, Springfield, IL, for public notification questions.



July 3, 2002

Mr. Jim Blough
Mail Code DW-8J
77 W Jackson Blvd.
Chicago IL 60604

RE: Detrex Corporation
Part B Permit Renewal Application
Subpart CC requirements & Part A

Dear Mr. Blough:

As per our phone conversation, Detrex has addressed the issue of Subpart CC in Sections D & F of our permit application (Copies of Sections D & F, Process Information & Procedures to Prevent Hazards, are enclosed for your review). Since the facility is only a storage facility, with no processing or transferring of waste from one container to another, the only applicable portion of Subpart CC is that dealing with the storage of containers. The Department of Transportation specifically requires that all Hazardous Wastes must be shipped in DOT approved containers according to the Hazardous Material Regulations.

The transportation of Hazardous Materials by Highway is covered under 49 CFR Subparts 171, 172, 173, & 177. These regulations outline: the general requirements for shipment of hazardous materials, the requirements for markings, labels, placards & shipping papers, the shippers responsibilities, and carriers responsibilities. Subpart 178 of the regulations outlines packaging specifications and the markings used by container manufacturers specify the packages suitability for shipment of a hazardous material.

At your request I have also provided another Part A Application using the version you provided. I have not provided a copy of this updated application to Ms. Mary Riegler as the original application contains the same information. In the event that it is deemed necessary, I will forward her a copy.

I would like to thank you in advance for your help in renewing the Part B Permit Application. If the event you have any questions regarding the text on Subpart CC, please feel free to give me a call at 248-358-5800 ext 131.

Sincerely,

David Craig, CHMM, CET
Manager of Environmental and Safety Compliance

CC: File
Facility

Enclosures: Sections D & F of Application
Part A Application



State of Illinois

DEPARTMENT OF AGRICULTURE

Division of Natural Resources

State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281, 217/782-6297

Bureau of Farmland Protection

Bureau of Soil Conservation

October 3, 1991

Ms. Mara McGinnis
Public Involvement Coordinator
Illinois Environmental Protection Agency
Government and Community Affairs
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: RCRA/HSWA Permit
Detrex Corporation
Melrose Park, Illinois
IEPA NO.: 0311860003
ILD NO.: 074424938
NOTICE NO.: PB13-91

Dear Ms. McGinnis:

The Illinois Department of Agriculture (IDOA) was notified by the IEPA of the Agency's intent to issue a joint Resource Conservation and Recovery Act (RCRA) and Hazardous and Solid Waste Amendments (HSWA) permit to the Detrex Corporation in Melrose Park, Illinois. In discussing this permit application with you on October 1, 1991, I found that the IEPA intends to issue a permanent Part B permit to the Detrex Corporation as it has been operating a waste transfer station under an interim status. The transfer station is located within the corporate boundaries of Melrose Park.

The IDOA would have no objections to the permit since it will impact no agricultural land. The IEPA's approval of the joint RCRA/HSWA permit would be consistent with the IEPA's Agricultural Land Preservation Policy which was developed in compliance with the state's Farmland Preservation Act.

Sincerely,

James R. Hartwig
Bureau of Farmland Protection

JRH:mdg

cc: North Cook County SWCD
Michael Platt, IDOA

**RESPONSE TO COMMENTS
REGARDING THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
HAZARDOUS WASTE MANAGEMENT PERMIT
ISSUED TO
DETREX CORPORATION. GOLD SHIELD SOLVENTS
MELROSE PARK, ILLINOIS
ILD 074 424 938**

INTRODUCTION

This response is issued pursuant to Title 40 of the Code of Federal Regulations (40 CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included within the administrative record.

No comments were received from the public concerning the draft Federal portion of the RCRA permit during the 45-day comment period. A request for a hearing was also not received. The only comments received were from Detrex Corporation. The comments did not deal with any of the conditions found in the United States Environmental Protection Agency (U.S. EPA) Draft Permit. The 45-day public comment period commenced on September 25, 1991. During the public comment period, copies of the permit application, Federal and State draft permits, and Fact Sheets were kept at the Melrose Park Public Library, 801 N. Broadway, Melrose Park, Illinois 60160. The termination date of this comment period was November 11, 1991.

DETERMINATION

Based on a full review of all relevant data provided to the U.S. EPA, the U.S. EPA has determined that the final permit contains such terms and conditions necessary to protect human health and the environment. In addition, based on its review of applicable materials and pertinent regulations, the U.S. EPA has determined that revision and/or clarification of the draft permit was not necessary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

(5HR-13)

JAN 03 1991

CERTIFIED MAIL P 246 372 085
RETURN RECEIPT REQUESTED

Jeffery P. Philips
Branch Manager
Detrex Corporation
2537 Lemoyne Ave
Melrose Park, Illinois 60160

RE: Request for Subpart AA and BB
Information for Part B
Application, ILD 074424938

Dear Mr. Philips:

On June 21, 1990, the United States Environmental Protection Agency (U.S. EPA) promulgated a rule in 55 Federal Register 25454, limiting organic air emissions as a class at hazardous waste treatment, storage, and disposal facilities requiring a permit under Subtitle C of the Resource Conservation and Recovery Act. The effective date for this rule is December 21, 1990.

The U.S. EPA is formally requesting that Chicago ^{Y.M.C.} Recycle Center, submit information required by 40 CFR Sections 270.14, 270.24 and 270.25 that will show compliance with the air emissions rules, Subparts AA and BB.

Enclosed is a checklist of Subparts AA and BB information requirements that you may use as a guideline in preparing your submittal. The Subparts AA and BB information requirements must be submitted to the following address by Friday, February 8, 1991:

George Hamper
RCRA Permitting Branch (5HR-13)
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

Please be advised that the December 21, 1990 date is applicable to the requirements to develop and implement a monitoring plan for equipment leaks, to identify any process vents included in the process vent rules, to develop emission calculations for those affected vents, and the identification of control technology, if required. Records of the equipment leak monitoring plan and its implementation, and process vent information must be kept in the operating file on the premises, available for inspection as of this date. These records may be submitted in partial/complete fulfillment of the 40 CFR Sections 270.14, 270.24 and 270.25 requirements.

Information you submit can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We will coordinate review of your application with the Illinois Environmental Protection Agency and if your submittal is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. If, during the processing of your application, the State hazardous waste program becomes authorized to issue RCRA permits for the air emission rules, direct Federal processing will cease, and the State in lieu of U.S. EPA will make the final determination on your application. In either case, please be aware that all State and local requirements still apply.

We are committed to conducting the RCRA/HSWA permitting process as efficiently as possible. Consequently, I suggest you contact Robert Fuhrer, of my staff at (312) 353-4889, if you have any questions concerning your submittal. We look forward to receiving this information.

Sincerely yours,


George Hamper, Chief
Illinois Section
RCRA Permitting Branch

Enclosure

• **SHIPPING** Complete items 1 and 2 when additional services are desired. **DO** complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Jeffery P. Philips Branch Manager Detrex Corporation 2537 Lemoyne Ave Melrose Park, IL 60160	4. Article Number P 246 372 085 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature - Addressee X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery 11/7	

Part B 113

0311860003

USEPA

MIKA, MEYERS, BECKETT & JONES
ATTORNEYS AT LAW

SUITE 700
200 OTTAWA AVENUE, N. W.

GRAND RAPIDS, MICHIGAN 49503

November 18, 1991

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DEC 17 1991

ERNEST A. MIKA
OF COUNSEL

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

TELEPHONE
(616) 459-3200

FACSIMILE
(616) 459-8085

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NOV 19 1991

IEPA-DLPC

ERYL N. MEYERS
JES B. BECKETT
JOHN C. JONES
STEVEN L. DYKEMA
JAMES R. BROWN
LARRY J. GARDNER
CLAUDE L. VANDER PLOEG
RONALD J. CLARK
JOHN M. DEVRIES
WILLIAM H. HERITAGE, JR.
MICHAEL K. REYNOLDS
MICHAEL C. HAINES
SCOTT S. BRINKMEYER
JOHN T. SPERLA
DAVID R. FERNSTRUM
MARK A. KEHOE
FREDRIC N. GOLDBERG
JAMES K. WHITE
DOUGLAS A. DONNELL

MARY L. MASON
W. STEVENS VANDERPLOEG
SCOTT E. DWYER
WILLIAM A. HORN
JEFFREY A. DEVREE
MARK A. VAN ALLSBURG
DALE A. MATTIS
ELIZABETH K. BRANSBORFER
LINDA L. BLAIS
NEIL L. KIMBALL
JAMES F. SCALES
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ROSS A. LEISMAN
JOHN C. STUIVE
NEIL P. JANSEN
KATHLEEN A. FEENEY
MARJORIE M. DIXON
MARY E. CONNERS

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
P. O. Box 19276
Springfield, Illinois 62794-9276

In Re: RCRA Part B Permit
Detrex Corporation, Melrose Park Facility
Permit No. 113

Dear Ms. Dragovich:

I am writing this letter in response to Lawrence Eastep's correspondence dated September 25, 1991 regarding the Draft Part B Permit relating to the Detrex facility in Melrose Park, Illinois. This letter contains Detrex' comments to the Draft Permit, the deadline for which was extended to November 16, 1991 per our November 4, 1991 telephone conversation.

The comments contained in this letter will be presented in the order that the issues are raised in the Draft Permit. Some of the comments may pertain to more than one permit provision, however, to avoid duplication, I will attempt to discuss the issue at the place in the permit where it first appears.

At the outset, Detrex is concerned that the September 25, 1991 cover letter and the Fact Sheet imply that there must necessarily be a period of time that the Melrose Park facility is closed while coating of the secondary containment area is accomplished and inspected for approval. In my telephone conversation with you on November 13, 1991, you indicated that a shutdown would not be required if Detrex could either, (a) designate an area for storage of waste less than 90 days; or (b) obtain agreement from IEPA inspectors to inspect the sealing activities in segments, enabling Detrex to use portions of the secondary containment area which are not being sealed while other portions are being sealed.

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IEPA/DLPC

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COMMON
P. 107
[REDACTED]

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 2

these options, so long as Detrex is not required to shut down its facility, we are agreeable to proceeding in that fashion.

In Section I(A) of the Draft Permit (page 1 of 13), reference is made to the concrete being coated with a "chemical resistant epoxy". Detrex would prefer that the word "epoxy" be deleted and replaced with the word "sealant" for the reason that some sealants are not technically an epoxy. Detrex will advise IEPA of the type of sealant which is proposed for use, and will obtain IEPA's approval of the same before commencing the actual coating operation.

Also in Section I(A), the permit states that a maximum of 300 55-gallon drums may be stored within the secondary containment area. There may have been some confusion with respect to Detrex' application in this regard. The secondary containment area is capable of storing 1,300 product, empty or non-hazardous waste drums in addition to the maximum 27,500 gallons of hazardous waste, while still satisfying the 10% secondary containment requirement in the regulations. Thus, Detrex proposes that the number 300 be changed to 1,300, or alternative, that Detrex be allowed to divide the secondary containment area into hazardous and non-hazardous/product/empty drum area, with the hazardous waste area satisfying the 10% requirement. Furthermore, the permit should also indicate that other DOT approved sized containers, other than 55-gallon drums, can be stored in the secondary containment area, so long as the 10% requirement is satisfied. A list of the DOT approved containers which Detrex proposes to store in its secondary containment area is attached to this letter. Detrex agrees that the total volume of hazardous waste stored in the hazardous waste storage area will not exceed 27,500 gallons.

In Section I(B)(2), the Draft Permit allows Detrex to store only those hazardous wastes identified in Table C1 of the application, also listed in Attachment A to the permit. Attachment A does not identify trichlorotrifluoroethane (freon) in the list of F001 wastes. This addition should be made to Attachment A to the permit. The five waste streams listed in Detrex' Table C-1 of the application should be listed under both F001 and F002 wastes in Attachment A to the permit.

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 3

In Section I(B)(3), Detrex is prohibited from storing hazardous or non-hazardous wastes "in the permitted unit" that are not identified in Attachment A to the permit. While Detrex understands that the Part B permit can regulate storage of non-hazardous wastes within the secondary containment area, Detrex does not believe that the Part B permit should restrict the ability of Detrex to store non-hazardous wastes outside the secondary containment area. In this regard, it is unclear what you mean by "the permitted unit", and this phrase should be changed to "the secondary containment area". In our discussions, you indicated that Detrex would be entitled to store non-hazardous wastes or product containers outside the secondary containment area in compliance with the terms of the Draft Permit.

In Section I(B)(4), the Draft Permit requires Detrex to perform, among other things, TCLP metals and organics tests prior to shipment of any drummed wastes to the Melrose Park facility. Detrex feels that this provision is overly broad in that many generators have already characterized the waste prior to shipment to Detrex' facility, and there is no need to perform an additional (and expensive) TCLP test prior to shipment. In situations where the generator has already characterized and identified the waste, the TCLP test should not be required. Detrex will agree to perform a TCLP metals and organics test for any Detrex customer, and for a new waste generated as a result of a process change by an existing Detrex customer. Detrex will further prepare a waste profile for such waste, and make such profile available to IEPA. Detrex will also perform TCLP tests as required by Section I(B)(a).

In our telephone discussion on November 13, 1991, you indicated that Section I(B)(5) could be deleted if Detrex could document that someone to whom the wastes would be shipped would accept wastes with a solvent content less than 30%. Detrex is able to do that, and, in fact, Detrex itself reclaims wastes with less than 30% solvent content at several of its other facilities outside Illinois. This documentation will be supplied to IEPA.

With respect to Section I(B)(6), Detrex does not believe that another ignitability test is required, particularly since the Melrose Park facility is not receiving ignitable wastes, nor does

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 4

it seek a permit to receive ignitable wastes. Thus, this test is both redundant and unnecessary. Likewise, testing for specific gravity should not be required, since the only hazardous wastes entering the facility are F001 and F002 wastes, and specific gravity merely reflects the percentage solvent content of the waste. The percentage solvent content should not be relevant to the Part B permit so long as the waste is a F001 or F002 waste.

In Section I(B)(7), Detrex is required to test for "all of the hazardous constituents" identified in Attachment A of the permit. Again, such testing above that suggest in our comments to Sections I(B)(4) and (9), seems unnecessary, particularly for wastes that have already been characterized and identified, and would require Detrex to undergo a substantial unnecessary expense simply to reconfirm that Detrex is permitted to handle the type of waste it is receiving.

With respect to Section I(B)(9) of the Draft Permit, we discussed the fact that a number of the tests required in paragraph (9) would, in some cases, have already been performed pursuant to Sections I(B)(4) and (5). You indicated that to the extent such tests had been done, no additional test would be required under paragraph (9). Additionally, Detrex again feels that it is unnecessary to conduct TCLP tests for customers whose wastes are previously identified and characterized prior to shipment.

In Section I(B)(10), the Draft Permit does not expressly authorize use of ASTM method D 4982-89 for ignitability testing. Detrex has proposed this method as an alternative to those methods set forth in paragraph (10), and feels that such test should be approved by IEPA.

In Section I(B)(12), the number 300 should be changed to the number 1,300 for the reasons discussed above under Section I(A). Additionally, the last sentence of paragraph 12 which states that containers of ignitable and combustible product "shall be stored" in separate areas should be deleted for the reason that the Melrose Park facility will not receive ignitable or combustible wastes and does not seek a permit to do so.

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 5

In Section I(B)(13), Detrex objects to the testing of "product" as required in the next to the last sentence, to the extent such product is not stored within the secondary containment area. Furthermore, the last sentence of paragraph (13) should be deleted in that the Melrose Park facility will only store hazardous wastes, and will not process the waste in any way. Thus, weekly composite samples should not be required.

In our telephone conversation, you agreed that Section I(E) of the Draft Permit requiring containers to be closed during storage will be interpreted so as to permit temporary opening for the purpose of gathering samples.

You have advised that Sections I(I) and (J) are standard provisions contained in all Part B permits. Nevertheless, Detrex feels these provisions should be deleted for the reason that Detrex is not seeking a permit to handle, nor will it handle the wastes described in these paragraphs.

Section I(K) should be modified to delete the word "epoxy" and replace it with the word "sealant", consistent with the change made in Section IA above.

Section I(L) of the Draft Permit requires a facility contingency plan to deal with any release of hazardous waste or product. Theoretically, the spilling of a teaspoon of waste would trigger this provision. Detrex submits that this paragraph should be limited to releases of reportable quantities of hazardous substances, as defined in the federal regulations. Furthermore, Section I(L)(3)(g) should be deleted entirely since this facility will not store any of the wastes described in that paragraph. Likewise, Section I(M) should be deleted for the same reason.

With respect to Section II of the Draft Permit, Detrex requests a clarification of paragraph (27) relating to waste minimization. The Melrose Park facility, as operated by Detrex, does not generate hazardous waste, but rather stores wastes generated from off-site sources. To that extent, it is unclear what type of program Detrex could implement to minimize waste. The fact that Detrex is storing hazardous wastes for subsequent recycling is

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 6

itself a waste minimizing activity. To the extent that this paragraph is intended to relate to a program for minimizing the possibility of unintended releases or spills of hazardous materials at the Melrose Park facility, such program is already in place and is made part of Detrex' standard operating procedure for the facility. If some other type of program is intended by this paragraph, we would appreciate clarification on this point.

Section II paragraph 34 should be deleted for the reason that these wastes are not stored at this facility.

With respect to Section III of the Draft Permit, Detrex submits that there should be only one designated solid waste management unit at the Melrose Park facility, namely the waste handling area at the truck dock. The other three areas designated in paragraphs (B)(2), (3) and (4) are not appropriate for designation as an SWMU. Specifically, the "fuel oil spill area" referred to in paragraph (2) is not an area utilized by Detrex for handling hazardous waste materials. To the extent that there was inadvertent spilling of fuel oil at this location, Detrex acknowledges its obligation to clean up such a spill, but feels it is inappropriate to characterize this small surface spill as a solid waste management unit under Section 3004 of RCRA. RCRA does not require every area where there has been a release of every material, hazardous or otherwise, to be designated as an SWMU. Where, as here, any release would have been inadvertent and would not have been the result of normal handling of hazardous wastes, this area should not be designated as an SWMU. Moreover, Detrex is unaware of any determination made by IEPA that the "spill area" even contains hazardous waste.

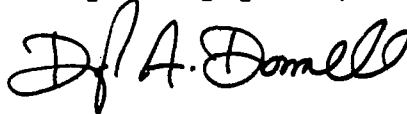
Likewise, the "tank car unloading area" should not be designated as an SWMU. Detrex does not receive hazardous waste via tank car, and knows of no release of contaminants at this area. If the sole basis for designation of this area as an SWMU is the fact that there could some day potentially be a release of contaminants at this location, then virtually any area could be designated an SWMU, to the extent that hazardous materials could potentially be released at that location.

Ms. Amy L. Dragovich
Illinois Environmental Protection Agency
November 18, 1991
Page 7

Finally, the "possible leaking underground storage tank" referred to in paragraph (4) has already been closed pursuant to an authorized closure. I have attached to this letter various documents evidencing the closure of this underground tank, including the required government inspections.

Again, thank you for the courtesy of extending our deadline for making these comments. We look forward to working with you in resolving these issues, and feel that we should be able to resolve these points. If you have any questions regarding any of these matters, please do not hesitate to contact either Issa Shamiyeh, Charles Guy or Bill Moore of Detrex, or the undersigned at your convenience.

Very truly yours,



Douglas A. Donnell

DAD:jet

cc: Mr. Issa Shamiyeh
Mr. Bill Moore
Mr. Charles Guy
Ms. Keri Luly

Part B - 113

CRA

Consulting Engineers

USEPA

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1G2
(519) 884-0510

July 23, 1991

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
62794-9276

Dear Mr. Eastep:

Re: Detrex Corporation
Part B Permit Application
Melrose Park Facility (EPA I.D. No. ILD 074424938)

On behalf of Detrex Corporation, please find enclosed at total of four (4) copies of information provided in response to the January 4, 1991 Technical Notice of Deficiency (NOD). This NOD was discussed in a meeting between IEPA, Detrex and CRA on February 11, 1991. CRA has remained in contact with Ms. Amy Dragovich, of your staff, to keep IEPA aware of Detrex's progress in addressing each specific aspect of the NOD.

The material provided includes:

- 1) References to Gold Shield Solvents have been removed and pages and figures replaced as necessary. The legal name of the facility operator is Detrex Corporation. Detrex operates under the new commercial name Solvent and Environmental Service Division, however the legal name of the facility remains Detrex Corporation.
- 2) Section C has been reissued to address IEPA concerns. It is understood from the February 11, 1991 meeting held in Springfield and telephone conversations with Ms. Amy Dragovich that IEPA will re-evaluate Detrex's responses regarding sampling and test methods.
- 3) Section G has been reissued to address IEPA comments on the Hazardous Evaluation. As was discussed by telephone between Ms. Dragovich and the undersigned on several occasions, the delay in responding to these issues was due to the sever difficulty in realistically

Folder # 2

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JUL 24 1991

IEPA-DLPC

July 23, 1991

Reference No. 2471

-2-

modelling air dispersion relating to a fire or explosion scenario. The Contingency Plan has been expanded to include air modelling of a worst-case scenario vapor release.

- 4) New job descriptions have been provided by Detrex Corporation as Attachment H-1.

All of the new material provided has been noted with a revision number and date revised and should replace the corresponding page, section or Attachment in the previous submittal.

CRA and Detrex appreciate the assistance provided by Ms. Dragovich during the preparation of these responses. We regret any inconvenience the lengthy time required to address IEPA's comments may have caused.

Should you have any questions, please do not hesitate to contact Mr. Charlie Guy (Detrex 216-997-6131) or the undersigned at your convenience.

Sincerely

CONESTOGA-ROVERS & ASSOCIATES



Bruce McConnell, P.Eng.
BMC/cdd/10

Encl.

c.c. Mr. C.U. Guy
Mr. Dan Anderson



B-113

CRA

Consulting Engineers

USEPA
CAZ
ALD

cc reg 5/30/91

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1C2
(519) 884-0510

May 28, 1991-

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
62794-9276

Dear Mr. Eastep:

Re: Detrex Corporation Gold Shield Solvents
Part B Permit Application
Melrose Park Facility (EPA I.D. No. ILD 074424938)

On behalf of Detrex Corporation, please find enclosed at total of four (4) copies of information provided in response to the January 4, 1991 Technical Notice of Deficiency (NOD). This NOD was discussed in a meeting between IEPA, Detrex and CRA on February 11, 1991. CRA has remained in contact with Ms. Amy Dragovich, of your staff, to keep IEPA aware of Detrex's progress in addressing each specific aspect of the NOD.

Provided with the response is:

- 1) Updated EPA Form 1 and 3 to replace existing Attachment A-1;
- 2) Revised page B-5 to correct the dual classification coding of Detrex's waste;
- 3) Revised Hazardous Substance Information Forms are provided;
- 4) A revised Closure Plan and Post-Closure Plan (Section I) is provided including a 1991 closure cost estimate based on third party costs. Attachment I-4 (Financial Assurance) is provided as the March 28, 1991 Detrex submittal. This will require updating based on the increased closure cost estimate required by considering third party costs.

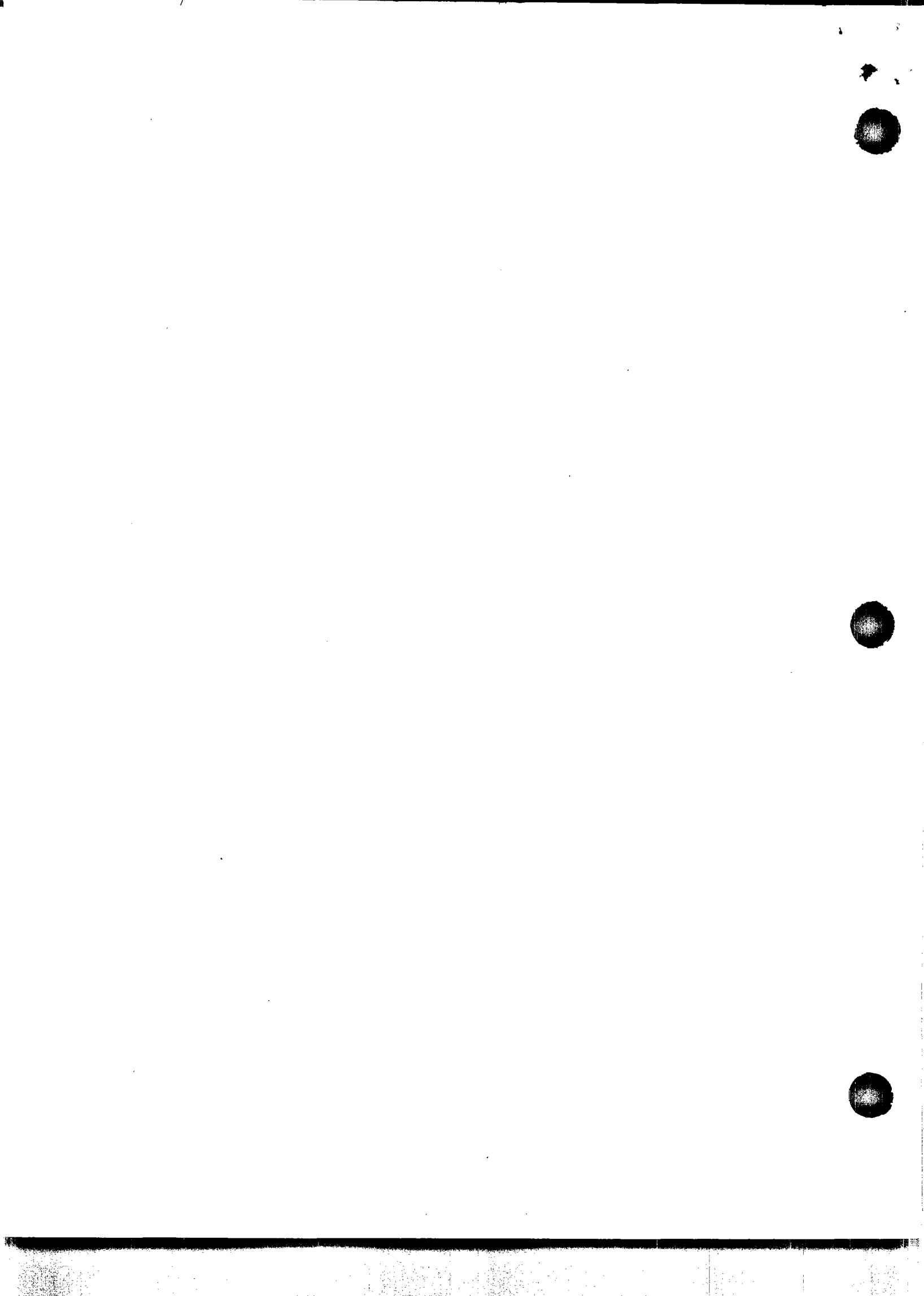
The specific IEPA NOD Comments that are addressed by the above have been copied and responses provided in the attached response letter.

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-2-

The specific NOD comments on the Waste Characterization and Contingency Plan sections of the Permit Application are being worked on. The waste characterization section is being revised over and above those issues raised by IEPA and discussed at the February 11, 1991 meeting. This is due to the corporate change in the Ashtabula Laboratory referenced in previous submittals as conducting all Detrex analysis. Detrex now conducts analytical work out of locations in Detroit, Michigan and Charlotte, North Carolina as well as an independent laboratory located in Livonia, Michigan. The air dispersion modelling required by IEPA comments on the Contingency Plan is being pursued. CRA is awaiting the computer program "ARCHIE" recommended by Ms. Dragovich. The documentation has been received and is being reviewed, however the computer code was inadvertently not provided.

Detrex and CRA will continue to work towards providing the additional information requested by IEPA. We appreciate Ms. Dragovich's input and cooperation in addressing the remaining issues.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Bruce McConnell, P.Eng.
BMC/cdd/9

Encl.

c.c. Mr. C.U. Guy
Mr. Dan Anderson

May 27, 1991

Reference No. 2471

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

Comment #1

The facility contact listed on Form 1 must be changed to Mr. Dan Anderson, the current Branch Manager.

Page 4 of 5, Section VII of Form 3 must be completed.

Page 4 of 5, Section VIII of Form 3 must be completed.

The Agency has received a copy of a request from Detrex to USEPA, dated September 24, 1990, regarding the addition of additional waste codes. This request should have been accompanied with a Part A modification. The Agency has not yet received this Part A modification. In addition, the request included many constituents that were not included in the Part B permit application or the state operating permit. Additional information must be provided throughout the Part B permit application to address these additional waste codes (i.e., the waste analysis plan, the design of the container storage area for incompatibles, management of incompatibles, the contingency plan, the closure plan, etc...) prior to their approval.

Response #1

EPA Forms 1 and 3 have been corrected and signed by Detrex and the property Owner.

The Part B permit application has been revised to address the additional waste codes added under the Part A modification submitted by Detrex Corporation on September 24, 1990.

C. WASTE CHARACTERISTICS

Comment #2

C-2(b) Test Methods: 724.113(b) (2)

Test methods used to test of the parameters chosen must reference the EPA Test No. in SW-846 (Third Edition). Revise the test methods to use only SW-846 methods. Detrex has not demonstrated that the proposed method for

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the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Page C-11 of the application states that if the flammable portion of the waste sample exceeds 10 percent by volume, the distillate portion of the waste will be analyzed for ignitability. Describe how this determination will be made and demonstrate that this analysis will be completed prior to storage of the wastes in the container storage area. All waste streams should be analyzed for ignitability at least once a year.

Response #2

It is understood that IEPA will review previous responses submitted regarding the applicability of the testing and sampling methods utilized by Detrex.

Detrex will conduct ignitability tests on a sample collected from each drum received at the facility. The ignitability tests will be conducted in accordance with ASTM Test Method D4982-89 (Standard Test Method for Flammability Potential Screening Analysis of Wastes). In the event the ignitability test provides a positive result (ie. ignition occurs), the appropriate drum will be considered unacceptable. The drum would then be returned to the original generator or arrangements made on behalf of the original generator to disposal of the drum at a permitted facility.

Comment #3

C-2(c) Sampling Methods: 724.113(b) (3)

The sampling protocol used at the facility must be consistent with SW-846 to ensure samples received at the labs are representative of the wastes to be stored in the container storage area.

Table 5.1 of the Laboratory Quality Assurance Project Plan states the sample containers will use a polyethylene-lined closure. However, SW-846 recommends the use of a teflon liner. SW-846 does not differentiate between closures for samples to be analyzed for volatiles and semi-volatiles. (See also Table 4-1 of the latest edition of SW-846.) Modify the sampling procedures to use SW-846 procedures.



In addition, care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Composite samples do not provide a more representative sample when those samples are to be analyzed for volatile organics. Modify the sampling protocol in the waste analysis plan to address this issue.

Prior to storing drums in the hazardous waste container storage area, sampling and visual characterizations must be conducted to verify that the waste streams are consistent with previous samples of the same waste.

For waste that are multi-layered, a discussion must be included explaining which layer(s) will be sampled and why. Each layer must be sampled separately.

The waste analysis plan must also address what safety precautions will be taken during the sampling of hazardous waste. The minimum protective clothing for persons collecting samples of hazardous wastes must include gloves, goggles, and boots. If hazardous vapors are possible, respiratory protection must also be available.

Response #3

As indicated above, it is understood the IEPA will review previous responses submitted regarding the applicability of the testing and sampling methods utilized by Detrex.

Comment #4

C-2(d) Frequency of Analysis: 724.113(b) (4)

Provide the criteria used to determine if the waste will be acceptable to the off-site recycling facility (i.e., an acceptable range of solvent content). The current state permit for Detrex, Supplemental Permit 1984-875-SP, requires a minimum solvent content of 30 percent.

Page C-11 of the application states that "before any hazardous waste material is accepted from a new customer for shipment...the waste is sampled." Clarify where this sampling is conducted.. The preliminary assessment sampling should be conducted by Detrex personnel and the drum sealed to ensure the waste is not tampered with prior to shipment to Detrex. Additional detail is required to demonstrate that the preliminary assessment sample handling between the generators facility and the Detrex facility follows SW-846.

Prior to the shipment of any drummed waste to Detrex, a preliminary assessment must include analysis of a waste sample for specific gravity. This result must be recorded and kept in the operating record. A sample must then be sent to the laboratory and analyzed for specific gravity, ignitability, TCLP metals, and volatile organics. Analysis for specific gravity at the lab will ensure that a representative sample was received by the laboratory. These laboratory reports must also be kept as part of the operating record. If the waste contains levels of the solvents at an acceptable range as identified in the waste analysis plan, the facility may accept drums of that waste from that customer. Prior to storing drums in the hazardous waste container storage area, all drums must be analysed for specific gravity and this number compared to the one recorded during the preliminary assessment. If a discrepancy is found, this waste must not be accepted at the facility prior to reanalysis. If the specific gravity is consistent with previous analysis, the drums may be stored at the facility while a sample is being sent off-site for analysis of volatile organics.

Upon receipt of drums from off-site, a minimum of one sample per customer and 10 percent of the containers received daily must be analyzed for volatile organics.

Once a year a sample from each waste stream from each customer must be sent off-site to the laboratory for analysis of specific gravity, volatile organics, ignitability and the TCLP metals. For existing customers, this analysis must be conducted within ninety (90) days of the effective date of this permit.

Response #4

Detrex is preparing a request to the State for elimination of the minimum 30 percent solvent content restriction from Supplemental Permit 1984-875-SP.

Regular sampling is conducted by Detrex personnel after the drum has been received at the Melrose Park facility. For new customers, the waste stream is sampled by Detrex personnel at the generators location. At this same time, the waste generation process is reviewed by Detrex to ensure acceptability of the waste. All of the analytical data is reviewed prior to accepting waste from a new customer.

Specific gravity and volatile organics tests are performed on every drum of waste received at the facility. Ignitability is a test that is being evaluated.

Comment #5

C-3 Quality Assurance: 702.145

Modify the Quality Assurance Project Plan to address Comment C-2(d) Frequency of Analysis above.

Detection limits used for the different analytical methods must be specified. Percentages are not acceptable. To demonstrate an organic parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846. Detrex has not demonstrated that the proposed method for the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Section 2.1 indicates an analysis for stabilizer components content will be conducted. Provide information on this procedure, including the method that will be used.

The frequency of duplicate, blank and spiked samples must be consistent with SW-846. SW-846 requires that these procedures be performed at least once with each analytical batch with a minimum of once per twenty samples. Modify the Quality Assurance Project Plan to address this.

Section 5.3.2 Composite Liquid Concentrated Waste Samples must be removed from the Quality Assurance Project Plan. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method.

Section 5.3.3 Equipment Decontamination indicates that "the glass thief is decontaminated between each set of drum samples that are collected from a similar waste type. Decontamination consists of rinsing the glass thief with pure solvent of the same type as the solvent waste that is to be sampled." This section must be modified to include decontamination of equipment that will be used for different waste types. If a solvent will be used for decontamination, discuss the precautions that will be used to ensure the proper solvent is used.

Provide a sample copy of the sample container labels. A copy was not provided with the response to the first technical review.

The Table of Contents for the Quality Assurance Project Plan indicates there is a Section 8.2 Flash Point. This section was not included in the submittal. Clarify this discrepancy. All waste streams should be analyzed for ignitability at least once a year.

Response #5

As discussed during our meeting at IEPA offices on February 11, 1991, the type of wastes handled by Detrex (ie. percentage level solvents) are not applicable to general SW-846 requirements. Upon re-resubmittal of the Waste Characteristics section including the Quality Assurance Project Plan, a further discussion of rationale for methods of analysis and sampling utilized by Detrex will be provided.

D. PROCESS INFORMATION

Comment #6

D-1(a)(3) Requirements for the Base or Liner to Contain Liquids:
724.275 (a) (1)

Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and sides of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate that the coating is compatible with all wastes to be stored in the unit.

Response #6

Detrex appreciates the list of potential sealants received from IEPA. A subcontractor has been hired to conduct a similar sealing operation at Detrex's TSD facility located in Euclid Ohio. This facility operates as a container storage area identically to the facility located in Melrose Park, Illinois. The subcontractor is presently awaiting bid prices from the potential sealant vendors. Based on these prices quotes, a sealant vendor will be selected and the sealant coating applied, according to manufactures' specifications, to the concrete floor at the Euclid Ohio facility. Detrex proposes to IEPA that subsequent to a suitable performance evaluation period for the Euclid Ohio facility concrete sealant application (ie. 90 days), Detrex will address a similar sealent program at the Melrose Park, Illinois facility.

Detrex maintains that the existing concrete flor should be considered adequately impermeable to prevent migration of chemicals through the concrete under the operational consideration of the Melrose Park facility. Thus, Detrex believes the proposed performance evaluation perod to evaluate the Euclid, Ohio sealant program is appropriate. This period will allow Detrex to ensure itself that the significant expense of the required sealant program will meet the expectations of the state agencies and thus be justified.

IEPA will be notified when the actual sealant program is being condcuted at the Euclid Ohio facility. Within 90 days of that date, IEPA would be notified of the date for a similar program to be conducted at the Melrose Park facility.

Subsequent to the completion of the sealant program at the Melrose Park facility, Section D-1a(3)(a) of the Permit Application will be revised to incorporate the sealant application.

G. CONTINGENCY PLAN**Comment #7**

The contingency plan must include the necessary information and description to satisfy the requirements of 35 I11. Adm. Code Part 724.156. The contingency plan must be revised to demonstrate that the following information was considered, at a minimum.

- a. The hazardous substance information forms in Appendix A of Attachment G-5 indicate that 1,1,1-trichloroethane could be explosive. Provide the explosive limits for 1,1,1-trichloroethane.
- b. The hazardous substance information forms do not indicate if trichloroethylene has any toxic byproducts. This form must be revised to indicate if toxic byproducts are possible, and if so what they are.
- c. The hazardous substance information forms do not indicate if perchloroethylene is explosive or has any radioactive hazards. This section must be completed. If perchloroethylene could be explosive, provide the explosive limits.
- d. The hazardous substance information forms do not indicate if a radioactive hazard exists for trichlorotrifluoroethane. Provide this information.
- e. Detrex must determine the concentrations of the hazardous constituents stored at the facility and possible byproducts that could reach the residential properties and the industrial area adjacent to the facility during a release, fire, and/or an explosion. The determination must also be made at the Detrex facility to protect workers and emergency responders to the release, fire, and/or explosion. This information must be used to determine the extent of an evacuation area.
- f. Define what is meant by the Threshold Limit Value. For the hazardous constituents stored at the facility and possible byproducts, the evaluation must compare the exposure guidelines to the estimated concentrations obtained above (Comment G.e.). If exposure standards are available, they should be used in this evaluation.
- g. The contingency plan must include the criteria that will be used to determine if a release, fire, and/or explosion could threaten human health or the environment. This determination must also take into account the capabilities of emergency equipment at the site.

Detrex must also determine the length of time that surrounding facilities and residents would have to evacuate prior to a direct uncontrolled impact on human health and the environment from a release, fire, and/or explosion.

- h. Additional detail must be provided to determine when the fire department with the assistance of the Emergency Coordinator will evacuate the facility and the surrounding area (i.e., wind, chemicals involved, potential byproducts, volume, fire, explosion, etc.).

In addition, Detrex should computerize their waste storage (amount, storage location, generator location, description and hazardous waste I.D. number) to be better prepared for emergencies. Detrex has not demonstrated that the existing log book provides all of this information. Detrex should be able to determine the contents of a drum by its location within the hazardous waste storage area.

Response #7

The hazardous substance information forms have been updated to incorporate the items raised in items a) through d) of the IEPA comments. Copies of the updated forms are provided.

With respect to items e) and g) of the IEPA comment, Detrex and CRA will attempt to model a release due to fire and/or explosion with an initial assumption that the release concentration is 100% of each particular parameter individually. Based on this initial modelling, more reasonable estimates may be utilized to estimate potential evacuation area. With respect to on-site workers and emergency responders, in the event of a fire and/or explosion related to the hazardous wastes, facility individuals would immediately evacuate upwind and emergency responders would take all necessary precautions (ie. health and safety equipment including respirators) regardless of actual airborne threat or not as standard precautions.

Regarding IEPA item f. Threshold Limit Values (TLVs) refer to airborne concentrations of substances and represent conditions under which it is believed that nearly all workers may be repeatedly exposed day after day without adverse affect (ie. time weighted average concentration over a 40 hour work week). The TLVs for various compounds are developed by the American Conference of Genernal Industrial Hygienists (ACGIH). For the purpose of an evacuation trigger, a Short-Term Exposure Limit (STEL) would be appropriate. The STEL represents a 15 minute time-weighted average concentration exposure which should not be exceeded during a working day. Upon completion of the modelling work, appropriate discussions of exposure assumptions will be documented.

As discussed with Ms. Amy Dragovich by telephone, the CHEMS-PLUS dispersion model provided by Arthur D. Little was ordered but has not been received. A dispersion modelling package (ARCHIE), provided by the Federal Emergency Management Agency, recommended by Ms. Dragovich, was subsequently ordered. The manual was received, however the computer disk was missing. This has been requested and should have been forwarded last week. CRA and Detrex will continue to attempt to address the air dispersion modelling request of IEPA as soon as the software is received. The IEPA will be kept informed of progress.

H. PERSONNEL TRAINING

Comment #8

H-1b Training Content, Frequency and Techniques: 724.116 (c) and (d) (3)

The standard operating procedures for each individual job task related to hazardous waste management must be incorporated into the training manual.

Response #8

New job description of each individual job task are provided.

I. CLOSURE PLANS AND POST-CLOSURE PLANS

Comment #9

I-4 Closure Cost Estimate: 703.183(o), 724.242

Cost estimates must be based on third party costs and cannot include salvage value for sale of hazardous wastes. The cost estimate for disposal of the maximum inventory of waste is not adequate. This cost should be approximately \$300/drum. The cost should also be used for disposal of the wash water. Soils rinseate sampling should be approximately \$1200/sample, because of the new requirements for analysis of TCLP parameters. The cost estimate also does not include any disposal of contaminated soil and/or concrete.

Response #9

With the requirement to estimate costs utilizing third party costs and the corresponding cost to Detrex to provide financial assurance for closure costs, the disposal plan for the maximum waste inventory has been re-evaluated and revised. It is much more economic to dispose of F-series waste solvents in bulk than drummed. Thus the closure plan, and corresponding costs, have been revised to reflect this.

I-5 Financial Assurance Mechanism of Closure: 703.183 (o). 724.243

**I-5e Financial Test and Corporate Guarantee for Closure: 724.243 (f).
724.251 (f).**

Comment #10

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form. This form must also incorporate the latest closure costs (see also Comment I-4 above).

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicants financial statement for the latest fiscal year, and a special report from the certified public accountant.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

Response #10

The appropriate IEPA form has been received by Detrex and will be completed.

I-8 Liability Requirements: 703.183 (g), 724.247

I-8 (a) (2) Financial Test for Liability coverage: 724.247 (b) (2), 724.247 (f)

Comment#11

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form.

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountants report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required.

Response #11

The appropriate IEPA form has been received by Detrex and will be completed.

B-1 GENERAL DESCRIPTION [35 IAC 703.183(a)]

This Part B Permit Application is submitted by Detrex Corporation, for the Gold Shield Solvents facility located on LeMoyne Avenue in Melrose Park, Illinois. The Gold Shield Solvents facility is a treatment, storage, disposal (TSD) facility, by definition, for halogenated hydrocarbon waste solvents.

Gold Shield Solvents is located in Cook County, Melrose Park, Illinois. The Street address is:

2537 LeMoyne Avenue
Melrose Park, Illinois, 60160

The principal contact person for this Application is:

Mr. C. U. Guy
Manager of Environmental Compliance
P.O. Box 1398
Ashtabula, Ohio 44004
(216) 997-6131

Gold Shield Solvents specializes in the sale of halogenated solvents, cleaning equipment, and the collection of solvent wastes generated in degreasing and other cleaning operations. The facility operates under EPA Identification Number ILD 074424938. The Standard Industrial Classification Code (SIC Code) for the facility is 2869.

The hazardous waste operation at the Gold Shield Solvents facility in Melrose Park, Illinois consists of a container storage area used for the storage of drummed solvent wastes prior to the transfer of these wastes to an off-site Detrex solvent reclamation (recycling) facility or to an off-site permitted treatment/disposal facility.

All wastes accepted at the Gold Shield Solvents facility are classified as F001 or F002 hazardous wastes under 35 IAC Part 721. The wastes are also dually classified as D-series wastes with respect to Toxicity Characteristic Leaching Procedure (TCLP) parameters.

HAZARDOUS SUBSTANCE INFORMATION FORM

COMMON NAME: 1,1,1-TrichloroethaneCHEMICAL NAME: 1,1,1-TrichloroethaneCAS NUMBER: 71-55-6

I. PHYSICAL/CHEMICAL PROPERTIES

REFERENCE

Natural physical state: Gas _____ Liquid <u>X</u> Solid _____			1.
(at ambient temps of 20°C-25°C)			
Molecular weight	<u>133</u>	g/g-mole	1.
Density	<u>1.3376</u>	g/ml	1.
Specific gravity	<u>1.44 @ 20</u>	°C	2.
Solubility: water	<u>4500 mg/L @ 20</u>	°C	2.
Solubility: _____	<u>insoluble</u>	°C	
Boiling Point	<u>74.1</u>	°C	1. & 6.
Melting Point	<u>32.5</u>	°C	1. & 6.
Vapor Pressure	<u>100 mmHg @ 20</u>	°C	6.
Vapor Density	<u>@</u>		
Flash Point	<u>None</u>		6.
(open cup _____; closed cup _____)			
Other: _____			

II. HAZARDOUS CHARACTERISTICS

A. TOXICOLOGICAL HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Inhalation	<u>Yes</u>	No		3.
OSHA (PEL)				
ACGIH (TLV) <u>X</u>			<u>350 ppm</u>	3. & 4.
NIOSH			<u>200 ppm</u>	3.
IDLH			<u>1000 ppm</u>	3.
Ingestion	<u>Yes</u>	No		3.
Skin/eye absorption	<u>Yes</u>	No		3.
Skin/eye contact	<u>Yes</u>	No		3.
Carcinogenic			<u>Indefinite</u>	6.
Aquatic	<u>Yes</u>	No		
Other: _____	<u>Yes</u>	No		

B. TOXICOLOGICAL HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Combustibility Yes No _____
 Toxic byproduct(s): Yes No _____

6.

3. & 6.

Forms hydrochloric acid, phosgene and
 dichloroacetylene

3.

Flammability Yes No _____
 LFL _____
 UFL _____
 Explosivity Yes No _____
 LEL 6.8%
 UEL 10.5%

3.

7.

7.

C. REACTIVITY HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Reactivities: Yes No

D. CORROSIVITY HAZARD HAZARD? CONCENTRATIONS

REFERENCE

pH _____
 Neutralizing agent: _____

E. RADIOACTIVE HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Background Yes No _____
 Alpha particles Yes No _____
 Beta particles Yes No _____
 Gamma radiation Yes No _____

III. TARGET ORGANS: skin, eyes, cardiovascular system,
CNS

3.

IV. INCOMPATIBILITIES: strong caustics, strong
oxidizers, chemically active
metals such as aluminum,
magnesium powders, sodium and
potassium

3.

HAZARDOUS SUBSTANCE INFORMATION FORM

COMMON NAME: TrichloroethyleneCHEMICAL NAME: TrichloroethyleneCAS NUMBER: 79-01-6

I. PHYSICAL/CHEMICAL PROPERTIES

REFERENCE

Natural physical state: Gas _____ Liquid <u>X</u> Solid _____		1.
(at ambient temps of 20°C-25°C)		
Molecular weight	<u>131.38</u>	g/g-mole 6.
Density	<u>1.4649</u>	g/ml 6.
Specific gravity	<u>1.46 @ 20</u>	°C 6.
Solubility: water	<u>1.10 mg/L @ 25</u>	°C 2.
Solubility: _____	<u>@</u>	
Boiling Point	<u>86.7</u>	°C 6.
Melting Point	<u>-73</u>	°C 6.
Vapor Pressure	<u>100 mmHg @ 32</u>	°C 6.
Vapor Density	<u>4.53 @</u>	°C 6.
Flash Point	<u>89.6</u>	°C 6.
(open cup _____; closed cup <u>X</u>)		
Other: _____		

II. HAZARDOUS CHARACTERISTICS

A. TOXICOLOGICAL HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Inhalation	<u>Yes</u>	No		5.
OSHA (PEL) _____			<u>100 ppm</u>	5.
ACGIH (TLV) <u>X</u>			<u>50 ppm</u>	4. & 5.
NIOSH _____			<u>25 ppm</u>	5.
IDLH _____			<u>1000 ppm</u>	5.
Ingestion	<u>Yes</u>	No		5.
Skin/eye absorption	<u>Yes</u>	No		5.
Skin/eye contact	<u>Yes</u>	No		5.
Carcinogenic			<u>Animal Suspected</u>	6.
			<u>Human Suspected</u>	
Aquatic	<u>Yes</u>	No		
Other: _____	<u>Yes</u>	No		

B. TOXICOLOGICAL HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
Combustibility	Yes <u>No</u>	_____	_____
Toxic byproduct(s):	Yes <u>No</u>	_____	_____
Forms hydrogen chloride, phosgene and dichloroacetylene on burning			8.
Flammability	Yes <u>No</u>	_____	_____
LFL		_____	_____
UFL		_____	_____
Explosivity	Yes <u>No</u>	_____	5.
LEL		11%	5.
UEL		41%	5.

C. REACTIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Yes <u>No</u>		
Reactivities:			
_____		_____	_____
_____		_____	_____

D. CORROSIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Yes <u>No</u>		
pH _____			
Neutralizing agent:			
_____		_____	_____
_____		_____	_____

E. RADIOACTIVE HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
Background	Yes <u>No</u>	_____	_____
Alpha particles	Yes <u>No</u>	_____	_____
Beta particles	Yes <u>No</u>	_____	_____
Gamma radiation	Yes <u>No</u>	_____	_____

III. TARGET ORGANS:	<u>respiratory system, heart, liver,</u> <u>kidneys, CNS, skin</u>	3. & 5.
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IV. INCOMPATIBILITIES:	<u>strong caustics; chemically</u> <u>active metals such as barium,</u> <u>lithium, sodium, magnesium,</u> <u>titanium</u>	3. & 5.
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HAZARDOUS SUBSTANCE INFORMATION FORM

COMMON NAME: Methylene Chloride

CHEMICAL NAME: Methylene Chloride

CAS NUMBER: 75-09-2

I. PHYSICAL/CHEMICAL PROPERTIES

REFERENCE

Natural physical state: Gas _____ Liquid <u>X</u> Solid _____		1.
(at ambient temps of 20°C-25°C)		
Molecular weight	85	g/g-mole 1.
Density	1.3617	g/ml 1.
Specific gravity	@	
Solubility: water	20000 mg/L @ 20	°C 2.
Solubility: _____	@	
Boiling Point	39.75	°C 1.
Melting Point	-95	°C 1.
Vapor Pressure	380 mmHg @ 20	°C 6.
Vapor Density	2.93	6.
Flash Point	None	
(open cup _____; closed cup _____)		
Other: _____		

II. HAZARDOUS CHARACTERISTICS

A. TOXICOLOGICAL HAZARD HAZARD? CONCENTRATIONS

REFERENCE

Inhalation	<u>Yes</u>	No		5.
OSHA			500 ppm	5.
ACGIH	<u>X</u>		100 ppm	4. & 5.
NIOSH			75 ppm	5.
IDLH			5000 ppm	5.
Ingestion	<u>Yes</u>	No		3. & 5.
Skin/eye absorption	<u>Yes</u>	No		3. & 5.
Skin/eye contact	<u>Yes</u>	No		3. & 5.
Carcinogenic			Indefinite	6.
Aquatic	<u>Yes</u>	No		
Other: _____	<u>Yes</u>	No		

B. TOXICOLOGICAL HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
Combustibility	Yes <u>No</u>	_____	6.
Toxic byproduct(s):	Yes <u>No</u>	_____	6.
<u>Emits phosgene on burning</u>			6.
Flammability	Yes <u>No</u>	_____	3.
LFL		_____	
UFL		_____	
Explosivity	Yes <u>No</u>	_____	
LEL		12%	5.
UEL		19%	5.

C. REACTIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Yes <u>No</u>		
Reactivities:			
_____		_____	_____
_____		_____	_____

D. CORROSIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Yes <u>No</u>		
pH _____			
Neutralizing agent:			
_____		_____	_____
_____		_____	_____

E. RADIOACTIVE HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
Background	Yes <u>No</u>	_____	_____
Alpha particles	Yes <u>No</u>	_____	_____
Beta particles	Yes <u>No</u>	_____	_____
Gamma radiation	Yes <u>No</u>	_____	_____

III. TARGET ORGANS:	<u>skin, eyes, cardiovascular system,</u>	3. & 5.
	<u>CNS</u>	

IV. INCOMPATIBILITIES:	<u>strong oxidizers and caustics,</u>	3. & 5.
	<u>chemically active metals</u>	
	<u>such as aluminum or magnesium</u>	
	<u>powders, sodium and potassium</u>	

HAZARDOUS SUBSTANCE INFORMATION FORM

COMMON NAME: Perchloroethylene

CHEMICAL NAME: 1,1,2,2-tetrachloroethylene

I. PHYSICAL/CHEMICAL PROPERTIES

REFERENCE

Natural physical state: Gas _____	Liquid <u>X</u>	Solid _____	_____ 5.
(at ambient temps of 20°C-25°C)			
Molecular weight	<u>165.83</u>	g/g-mole	_____ 4.
Density	<u>1.6311</u>	g/ml	_____ 4.
Specific gravity	<u>1.6 @ 20</u>	°C	_____ 5.
Solubility: water	<u>150mg/l @ 25</u>	°C	_____ 2.
Solubility:	_____		
Boiling Point	<u>121.4</u>	°C	_____ 2.
Melting Point	<u>-22.7</u>	°C	_____ 2.
Vapor Pressure	<u>14.2 mmHG @ 20</u>	°C	_____ 5.
Vapor Density	<u>5.83 @</u>	°C	_____ 5.
Flash Point	<u>none</u>	°C	_____ 5.

(open cup _____; closed cup _____)

Other: _____

II. HAZARDOUS CHARACTERISTICS

A. TOXICOLOGICAL HAZARD	HAZARD?	CONCENTRATIONS (<u>PEL</u> , <u>TLV</u> , <u>Other</u>)	REFERENCE
-------------------------	---------	--	-----------

Inhalation	<u>Yes</u> No _____	_____ 5.
OSHA	<u>100ppm</u>	
ACGIH	<u>50ppm</u>	
NIOSH	<u>min. limit</u>	
IDLH	_____	
TWAEV	_____	
Ingestion	<u>Yes</u> No _____	_____ 3.
Skin/eye absorption	<u>Yes</u> No _____	_____ 3.
Skin/eye contact	<u>Yes</u> No _____	_____ 3.
Carcinogenic	<u>Yes</u> No _____	_____ 4.
Aquatic	<u>Yes</u> No _____	_____ 5.
Other: _____	<u>Yes</u> <u>No</u> _____	_____ 5.

B. TOXICOLOGICAL HAZARD HAZARD? CONCENTRATIONS REFERENCE

Combustibility	Yes <u>No</u>	_____	_____ 3.
Toxic by-product(s):	Yes <u>No</u>	_____	_____ 5.
<u>when heated to decomposition emits hydrogen chloride and possible traces of phosgene.</u>			
Flammability	Yes <u>No</u>	_____	_____ 5.
LFL		_____	
UFL		_____	
Explosivity	Yes <u>No</u>	_____	_____ 9.
LEL		_____	
UEL		_____	

C. REACTIVITY HAZARD HAZARD? CONCENTRATIONS REFERENCE

Reactivities:

_____	_____
_____	_____

D. CORROSIVITY HAZARD HAZARD? CONCENTRATIONS REFERENCE

pH <u>6.8-8.4</u>	_____ 5.
Neutralizing agent:	

_____	_____	_____
_____	_____	_____

E. RADIOACTIVE HAZARD HAZARD? CONCENTRATIONS REFERENCE

Background	Yes <u>No</u>	_____	_____ 7.
Alpha particles	Yes <u>No</u>	_____	_____ 7.
Beta particles	Yes <u>No</u>	_____	_____ 7.
Gamma radiation	Yes <u>No</u>	_____	_____ 7.

III. TARGET ORGANS: kidney, liver, CNS, respiratory system, eyes _____ 3, 5.

IV. INCOMPATIBILITIES: strong oxidizers, chemically active metals, such as barium, lithium, beryllium. Also caustic soda and caustic potash or oxidizing materials. _____ 4.

HAZARDOUS SUBSTANCE INFORMATION FORM

COMMON NAME: Freon TF Solvent

CHEMICAL NAME: Trichlorotrifluoroethane

I. PHYSICAL/CHEMICAL PROPERTIES

REFERENCE

Natural physical state: Gas _____	Liquid <u>X</u>	Solid _____	_____ 6.
(at ambient temps of 20°C-25°C)			
Molecular weight	<u>187.376</u>	g/g-mole	_____ 6.
Density	<u>1.57</u>	g/ml	_____ 6.
Specific gravity	<u>1.56 @ 25</u>	°C	_____ 2.
Solubility: water	<u>2mg/l @ 25</u>	°C	_____ 6.
Solubility:	<u>@</u>	°C	_____ 6.
Boiling Point	<u>48</u>	°C	_____ 6.
Melting Point	<u>-35</u>	°C	_____ 2.
Vapor Pressure	<u>270 mmHG@20</u>	°C	_____ 2.
Vapor Density	<u>6.47 @</u>	C	_____ 2.
<hr/>			
Flash Point	<u>none</u>	°C	_____ 6.
(open cup _____; closed cup _____)			
Other: _____			

II. HAZARDOUS CHARACTERISTICS

A. TOXICOLOGICAL HAZARD	HAZARD?	CONCENTRATIONS (<u>PEL</u> , <u>TLV</u> , <u>Other</u>)	REFERENCE
-------------------------	---------	--	-----------

<u>Inhalation</u>	Yes No _____		_____ 6.
OSHA	<u>1000ppm</u>		
ACGIH	<u>1000ppm</u>		
NIOSH	<u>1000ppm</u>		
IDLH	<u>4500ppm</u>		
TWAEV	_____		
Ingestion	Yes No _____		_____ 3.
Skin/eye absorption	Yes No _____		_____ 6.
Skin/eye contact	Yes No _____		_____ 6.
Carcinogenic	Yes No _____		_____ 6.
Aquatic	Yes No _____		_____ 6.
Other: _____	Yes No _____		_____ 6.

B.	TOXICOLOGICAL HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Combustibility	Yes <u>No</u>	_____	<u>3.</u>
	Toxic by-product(s):	<u>Yes</u> No _____	_____	<u>3.</u>
	<u>forms hydrochloric and hydrofluoric acids on decomposition</u>			
	Flammability	Yes <u>No</u>	_____	<u>4.</u>
	LFL		_____	
	UFL		_____	
	Explosivity	Yes <u>No</u>	_____	<u>6.</u>
	LEL		_____	<u>6.</u>
	UEL		_____	<u>6.</u>
C.	REACTIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
		<u>Yes</u> No _____		
	Reactivities:			
	<u>violent reaction with Al, Ba, Li, Sm, NaK, Ti</u>			<u>4.</u>
	_____		_____	
D.	CORROSIVITY HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
		Yes <u>No</u>		
	pH <u>neutral</u>			<u>6.</u>
	Neutralizing agent:			
	_____		_____	
	_____		_____	
E.	RADIOACTIVE HAZARD	HAZARD?	CONCENTRATIONS	REFERENCE
	Background	Yes <u>No</u>	_____	<u>7.</u>
	Alpha particles	Yes <u>No</u>	_____	<u>7.</u>
	Beta particles	Yes <u>No</u>	_____	<u>7.</u>
	Gamma radiation	Yes <u>No</u>	_____	<u>7.</u>

III. TARGET ORGANS: eyes, respiratory system, skin, liver, CNS, heart 3&4&6

IV. INCOMPATIBILITIES: active metals, strong caustics, and oxidizers
metals such as powdered Al, Zn, Ba, Li, NaK alloy, Ti, Be 4&6

REFERENCES

1. "The Merck Index. An Encyclopedia of Chemicals and Drugs, Ninth Edition." Martha Windholz (ed.) Merck & Co. Inc. Rahway, N.J. (1976).
2. Verscheuren, K. : "Handbook of Environmental Data on Organic Chemicals" Van Nostrand Reinhold Co., New York (1983).
3. U.S. Department of Health and Human Services "NIOSH Pocket Guide to Chemical Hazards", September 1985.
4. SAX, N.I.: "Dangerous Properties of Industrial Materials" Van Nostrand Reinhold Company, New York (1984).
5. Material Safety Data Sheet for Perchloroethylene, MSD#8208.22, Detrex Chemical Industries Limited, August, 1982.
6. Material Safety Data Sheet for Freon TF Solvent, E.I. du Pont de Nemours & Co. (inc.), October 1985.
7. Canadian Transport Emergency Center Database, Transport of Dangerous Goods Branch, Transport Canada
8. Material Safety Data Sheet for Trichloroethylene, #OH523850, Occupational Health Services Inc., October 1984
9. Material Safety Data Sheet for Tetrachloroethylene, #C1824, Fisher Scientific, August 1989

Part B - 113

USEPA

CRA

Consulting Engineers

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1C2
(519) 884-0510

March 1, 1991

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
USA 62794-9276

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Dear Mr. Eastep:

MAR 4 1991

Re: Notice of Deficiencies Second Technical Review
Part B Log #13 113
Detrex Corporation, Melrose Park Facility

IEPA-DLPC

On behalf of Detrex Corporation, the following provides specific responses to the above referenced Notice of Deficiency (NOD). This NOD was discussed with Ms. Amy Dragovich and Mr. Charlie Zeal of IEPA during a meeting held in Springfield Illinois on February 11, 1991.

CRA has almost completed a review of waste compatibility utilizing "A Method of Determining the Compatibility of Hazardous Wastes", by USEPA. Within 30 days, CRA will provide a demonstration of the compatibility of the wastes stored within the hazardous waste container storage area and, if appropriate, propose a program of compatibility testing to be completed on site.

CRA contacted Mr. Paul Croce of Arthur D. Little regarding the CHEMS-PLUS software package recommended by IEPA for hazard assessment of chemical release scenarios. Mr. Croce indicated that within the next few weeks, a new version of CHEMS-PLUS would be released. He recommended CRA wait until then to purchase the software package as a number of changes have been incorporated and it is much more user friendly. We are presently preparing data on chemicals and potential toxic byproducts during a release or fire. Upon receipt of the updated version of CHEMS-PLUS, the appropriate hazardous chemical release assessment will be conducted and reported to IEPA. The contingency plan will be revised, if necessary, based on this assessment. With the submittal of the waste compatibility review discussed above, CRA will provide a schedule for completion of the

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March 1, 1991

Reference No. 2471

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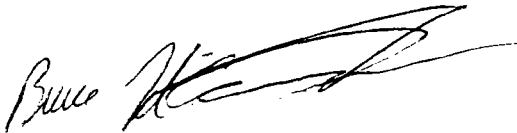
contingency plan review after receipt of the updated CHEMS-PLUS software package. At this time, all other outstanding issues (closure cost, sealant, EPA Forms, etc.) will also be provided.

CRA and Detrex will continue to do our utmost to address all IEPA comments in an expedited manner. Should you have any questions, do not hesitate to contact us.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Bruce McConnell, P.Eng.
BMC/cdd/7

Encl.

c.c. Mr. C.U. Guy, Detrex
Mr. Dan Anderson, Detrex
Steve Day, CRA

March 1, 1991

Reference No. 2471

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

Comment #1

The facility contact listed on Form 1 must be changed to Mr. Dan Anderson, the current Branch Manager.

Page 4 of 5, Section VII of Form 3 must be completed.

Page 4 of 5, Section VIII of Form 3 must be completed.

The Agency has received a copy of a request from Detrex to USEPA, dated September 24, 1990, regarding the addition of additional waste codes. This request should have been accompanied with a Part A modification. The Agency has not yet received this Part A modification. In addition, the request included many constituents that were not included in the Part B permit application or the state operating permit. Additional information must be provided throughout the Part B permit application to address these additional waste codes (i.e., the waste analysis plan, the design of the container storage area for incompatibles, management of incompatibles, the contingency plan, the closure plan, etc...) prior to their approval.

Response #1

EPA Forms 1 and 3 are being corrected and signed by Detrex.

The Part B permit application is being revised to address the additional waste codes added under the Part A modification submitted by Detrex Corporation on September 24, 1990. These revisions will be completed subsequent to the current waste compatibility review.

C. WASTE CHARACTERISTICS

Comment #2

C-2(b) Test Methods: 724.113(b) (2)

Test methods used to test of the parameters chosen must reference the EPA Test No. in SW-846 (Third Edition). Revise the test methods to use only SW-846 methods. Detrex has not demonstrated that the proposed method for

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IEPA-DLPC

the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Page C-11 of the application states that if the flammable portion of the waste sample exceeds 10 percent by volume, the distillate portion of the waste will be analyzed for ignitability. Describe how this determination will be made and demonstrate that this analysis will be completed prior to storage of the wastes in the container storage area. All waste streams should be analyzed for ignitability at least once a year.

Response #2

It is understood that IEPA will review previous responses submitted regarding the applicability of the testing and sampling methods utilized by Detrex.

The IEPA flammability concern is being evaluated. ASTM Test Method D4982-89 (Standard Test Method for Flammability Potential Screening Analysis of Wastes) is a potential test which may be appropriate.

Comment #3

C-2(c) Sampling Methods: 724.113(b) (3)

The sampling protocol used at the facility must be consistent with SW-846 to ensure samples received at the labs are representative of the wastes to be stored in the container storage area.

Table 5.1 of the Laboratory Quality Assurance Project Plan states the sample containers will use a polyethylene-lined closure. However, SW-846 recommends the use of a teflon liner. SW-846 does not differentiate between closures for samples to be analyzed for volatiles and semi-volatiles. (See also Table 4-1 of the latest edition of SW-846.) Modify the sampling procedures to use SW-846 procedures.

In addition, care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Composite samples do not provide a

more representative sample when those samples are to be analyzed for volatile organics. Modify the sampling protocol in the waste analysis plan to address this issue.

Prior to storing drums in the hazardous waste container storage area, sampling and visual characterizations must be conducted to verify that the waste streams are consistent with previous samples of the same waste.

For waste that are multi-layered, a discussion must be included explaining which layer(s) will be sampled and why. Each layer must be sampled separately.

The waste analysis plan must also address what safety precautions will be taken during the sampling of hazardous waste. The minimum protective clothing for persons collecting samples of hazardous wastes must include gloves, goggles, and boots. If hazardous vapors are possible, respiratory protection must also be available.

Response #3

As indicated above, it is understood the IEPA will review previous responses submitted regarding the applicability of the testing and sampling methods utilized by Detrex.

Comment #4

C-2(d) Frequency of Analysis: 724.113(b) (4)

Provide the criteria used to determine if the waste will be acceptable to the off-site recycling facility (i.e., an acceptable range of solvent content). The current state permit for Detrex, Supplemental Permit 1984-875-SP, requires a minimum solvent content of 30 percent.

Page C-11 of the application states that "before any hazardous waste material is accepted from a new customer for shipment...the waste is sampled." Clarify where this sampling is conducted.. The preliminary assessment sampling should be conducted by Detrex personnel and the drum sealed to ensure the waste is not tampered with prior to shipment to Detrex. Additional detail is

required to demonstrate that the preliminary assessment sample handling between the generators facility and the Detrex facility follows SW-846.

Prior to the shipment of any drummed waste to Detrex, a preliminary assessment must include analysis of a waste sample for specific gravity. This result must be recorded and kept in the operating record. A sample must then be sent to the laboratory and analyzed for specific gravity, ignitability, TCLP metals, and volatile organics. Analysis for specific gravity at the lab will ensure that a representative sample was received by the laboratory. These laboratory reports must also be kept as part of the operating record. If the waste contains levels of the solvents at an acceptable range as identified in the waste analysis plan, the facility may accept drums of that waste from that customer. Prior to storing drums in the hazardous waste container storage area, all drums must be analysed for specific gravity and this number compared to the one recorded during the preliminary assessment. If a discrepancy is found, this waste must not be accepted at the facility prior to reanalysis. If the specific gravity is consistent with previous analysis, the drums may be stored at the facility while a sample is being sent off-site for analysis of volatile organics.

Upon receipt of drums from off-site, a minimum of one sample per customer and 10 percent of the containers received daily must be analyzed for volatile organics.

Once a year a sample from each waste stream from each customer must be sent off-site to the laboratory for analysis of specific gravity, volatile organics, ignitability and the TCLP metals. For existing customers, this analysis must be conducted within ninety (90) days of the effective date of this permit.

Response #4

Detrex is preparing a request to the State for elimination of the minimum 30 percent solvent content restriction from Supplemental Permit 1984-875-SP.

Regular sampling is conducted by Detrex personnel after the drum has been received at the Melrose Park facility. For new customers, the waste stream is sampled by Detrex personnel at the generators location. At this same time, the waste generation process is reviewed by Detrex to ensure acceptability of the waste. All of the analytical data is reviewed prior to accepting waste from a new customer.

Specific gravity and volatile organics tests are performed on every drum of waste received at the facility. Ignitability is a test that is being evaluated.

Comment #5

C-3 Quality Assurance: 702.145

Modify the Quality Assurance Project Plan to address Comment C-2(d) Frequency of Analysis above.

Detection limits used for the different analytical methods must be specified. Percentages are not acceptable. To demonstrate an organic parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846. Detrex has not demonstrated that the proposed method for the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Section 2.1 indicates an analysis for stabilizer components content will be conducted. Provide information on this procedure, including the method that will be used.

The frequency of duplicate, blank and spiked samples must be consistent with SW-846. SW-846 requires that these procedures be performed at least once with each analytical batch with a minimum of once per twenty samples. Modify the Quality Assurance Project Plan to address this.

Section 5.3.2 Composite Liquid Concentrated Waste Samples must be removed from the Quality Assurance Project Plan. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method.

Section 5.3.3 Equipment Decontamination indicates that "the glass thief is decontaminated between each set of drum samples that are collected from a similar waste type. Decontamination consists of rinsing the glass thief with pure solvent of the same type as the solvent waste that is to be sampled." This section must be modified to include decontamination of equipment that will be used for different waste types. If a solvent will be used for

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decontamination, discuss the precautions that will be used to ensure the proper solvent is used.

Provide a sample copy of the sample container labels. A copy was not provided with the response to the first technical review.

The Table of Contents for the Quality Assurance Project Plan indicates there is a Section 8.2 Flash Point. This section was not included in the submittal. Clarify this discrepancy. All waste streams should be analyzed for ignitability at least once a year.

Response #5

As discussed during our meeting at IEPA offices on February 11, 1991, the type of wastes handled by Detrex (ie. percentage level solvents) are not applicable to general SW-846 requirements. Upon re-resubmittal of the Waste Characteristics section including the Quality Assurance Project Plan, a further discussion of rational for methods of analysis and sampling utilized by Detrex will be provided.

D. PROCESS INFORMATION

Comment #6

D-1(a)(3) Requirements for the Base or Liner to Contain Liquids:
724.275 (a) (1)

Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and sides of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate that the coating is compatible with all wastes to be stored in the unit.

Response #6

Detrex has received a list of potential sealants from IEPA. These sealants will be reviewed and an appropriate sealant selected and applied to the secondary containment system as soon as possible.

G. CONTINGENCY PLAN

Comment #7

The contingency plan must include the necessary information and description to satisfy the requirements of 35 I11. Adm. Code Part 724.156. The contingency plan must be revised to demonstrate that the following information was considered, at a minimum.

- a. The hazardous substance information forms in Appendix A of Attachment G-5 indicate that 1,1,1-trichloroethane could be explosive. Provide the explosive limits for 1,1,1-trichloroethane.
- b. The hazardous substance information forms do not indicate if trichloroethylene has any toxic byproducts. This form must be revised to indicate if toxic byproducts are possible, and if so what they are.
- c. The hazardous substance information forms do not indicate if perchloroethylene is explosive or has any radioactive hazards. This section must be completed. If perchloroethylene could be explosive, provide the explosive limits.
- d. The hazardous substance information forms do not indicate if a radioactive hazard exists for trichlorotrifluoroethane. Provide this information.
- e. Detrex must determine the concentrations of the hazardous constituents stored at the facility and possible byproducts that could reach the residential properties and the industrial area adjacent to the facility during a release, fire, and/or an explosion. The determination must also be made at the Detrex facility to protect workers and emergency responders to the release, fire, and/or explosion. This information must be used to determine the extent of an evacuation area.
- f. Define what is meant by the Threshold Limit Value. For the hazardous constituents stored at the facility and possible byproducts, the evaluation must compare the exposure guidelines to the estimated concentrations obtained above (Comment G.e.). If exposure standards are available, they should be used in this evaluation.

- g. The contingency plan must include the criteria that will be used to determine if a release, fire, and/or explosion could threaten human health or the environment. This determination must also take into account the capabilities of emergency equipment at the site.

Detrex must also determine the length of time that surrounding facilities and residents would have to evacuate prior to a direct uncontrolled impact on human health and the environment from a release, fire, and/or explosion.

- h. Additional detail must be provided to determine when the fire department with the assistance of the Emergency Coordinator will evacuate the facility and the surrounding area (i.e., wind, chemicals involved, potential byproducts, volume, fire, explosion, etc.).

In addition, Detrex should computerize their waste storage (amount, storage location, generator location, description and hazardous waste I.D. number) to be better prepared for emergencies. Detrex has not demonstrated that the existing log book provides all of this information. Detrex should be able to determine the contents of a drum by its location within the hazardous waste storage area.

Response #7

The Contingency Plan is being modified. The hazardous substance information forms are being corrected and will be utilized in evaluating potential releases during a release, fire, and/or explosion.

Arthur D. Little was contacted regarding the air dispersion model (CHEMS-PLUS) recommended by IEPA. An updated version of this model will be available from Arthur D. Little within the next month. Upon the release of the updated version, CRA will purchase a copy and complete an evaluation of potential releases including potential air releases which could require evacuation in the event of a fire.

H. PERSONNEL TRAINING

Comment #8

H-1b Training Content, Frequency and Techniques: 724.116 (c) and (d) (3)

The standard operating procedures for each individual job task related to hazardous waste management must be incorporated into the training manual.

Response #8

The Personnel Training Manual will be revised.

I. CLOSURE PLANS AND POST-CLOSURE PLANS

Comment #9

I-4 Closure Cost Estimate: 703.183(o), 724.242

Cost estimates must be based on third party costs and cannot include salvage value for sale of hazardous wastes. The cost estimate for disposal of the maximum inventory of waste is not adequate. This cost should be approximately \$300/drum. The cost should also be used for disposal of the wash water. Soils rinseate sampling should be approximately \$1200/sample, because of the new requirements for analysis of TCLP parameters. The cost estimate also does not include any disposal of contaminated soil and/or concrete.

Response #9

The closure cost estimate will be revised to reflect third party costs for all aspects of closure.

I-5 Financial Assurance Mechanism of Closure: 703.183 (o). 724.243

I-5e Financial Test and Corporate Guarantee for Closure: 724.243 (f). 724.251 (f).

Comment #10

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form. This form must also incorporate the latest closure costs (see also Comment I-4 above).

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicants financial statement for the latest fiscal year, and a special report from the certified public accountant.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

Response #10

The appropriate IEPA form has been received by Detrex and will be completed.

I-8 Liability Requirements: 703.183 (g), 724.247

I-8 (a) (2) Financial Test for Liability coverage: 724.247 (b) (2), 724.247 (f)

Comment#11

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form.

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountants report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required.

March 1, 1991

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Response #11

The appropriate IEPA form has been received by Detrex and will be completed.

USEPA



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311860003 -- Cook County
Detrex Corporation
ILD074424938
RCRA Permit Log No. 113

January 4, 1991

Detrex Corporation
Attn: Mr. Daniel Anderson
Branch Manager
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

Detrex Corporation
Mr. C.U. Guy
Manager of Environmental Compliance
P.O. Box 1398
Ashtabula, Ohio 44004

Gentlemen:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for one (1) hazardous waste container storage unit (S01) dated October 1, 1990 and received October 2, 1990 for the above-referenced facility. A list of the deficiencies identified during this second technical review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the technical review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 Ill. Adm. Code Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than March 1, 1991. Failure to submit a complete and technically adequate response by that date will result in a Notice of Intent to Deny your application for permit pursuant to 35 Ill. Adm. Code Part 705. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

9



Page 2

If you have any questions or wish to have a meeting regarding this subject, feel free to contact Amy L. Dragovich, P.E., of my staff at 217/782-6762.

Very truly yours,

Lawrence W Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

^{ALD}
LWE:ALD/mls/sp4494n/1-2

Enclosure

cc: Division File, w/enclosure
Maywood Region, w/enclosure
George Hamper, USEPA Region V, w/enclosure
Planning & Reporting Section
Bruce McConnell, P.E., w/enclosure
Administrative Record, W/Enclosure
Amy Dragovich, w/enclosure

Notice of Deficiencies
Second Technical Review
Part B Log #113

Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

0311860003
ILD074424938
January 4, 1991

Subject Requirements: 35 Illinois Administrative Code Subtitle G.

General Comment: Detrex must complete the attached prior conduct certification evaluation form and submit it with the response to this Notice of Deficiency. The form previously submitted was not filled out correctly. The owner/operator name must be the same as the signature of the applicant. The social security number is the applicant's social security number. The site name must be the facility name.

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

The facility contact listed on Form 1 must be changed to Mr. Dan Anderson, the current Branch Manager.

Page 4 of 5, Section VII of Form 3 must be completed.

Page 4 of 5, Section VIII of Form 3 must be completed.

The Agency has received a copy of a request from Detrex to USEPA, dated September 24, 1990, regarding the addition of additional waste codes. This request should have been accompanied with a Part A modification. The Agency has not yet received this Part A modification. In addition, the request included many constituents that were not included in the Part B permit application or the state operating permit. Additional information must be provided throughout the Part B permit application to address these additional waste codes (i.e., the waste analysis plan, the design of the container storage area for incompatibles, management of incompatibles, the contingency plan, the closure plan, etc. . .) prior to their approval.

C. WASTE CHARACTERISTICS

C-2(b) Test Methods: 724.113(b)(2)

Test methods used to test for the parameters chosen must reference the EPA Test No. in SW-846 (Third Edition). Revise the test methods to use only SW-846 methods. Detrex has not demonstrated that the proposed method for the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Page C-11 of the application states that if the flammable portion of the waste sample exceeds 10 percent by volume, the distillate portion of the waste will be analyzed for ignitability. Describe how this determination will be made and demonstrate that this analysis will be completed prior to storage of the wastes in the container storage area. All waste streams should be analyzed for ignitability at least once a year.

C-2(c) Sampling Methods: 724-113(b)(3)

The sampling protocol used at the facility must be consistent with SW-846 to ensure samples received at the labs are representative of the wastes to be stored in the container storage area.

Table 5.1 of the Laboratory Quality Assurance Project Plan states the sample containers will use a polyethylene-lined closure. However, SW-846 recommends the use of a teflon liner. SW-846 does not differentiate between closures for samples to be analyzed for volatile and semi-volatiles. (See also Table 4-1 of the latest edition of SW-846.) Modify the sampling procedures to use SW-846 procedures.

In addition, care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Composite samples do not provide a more representative sample when those samples are to be analyzed for volatile organics. Modify the sampling protocol in the waste analysis plan to address this issue.

Prior to storing drums in the hazardous waste container storage area, sampling and visual characterizations must be conducted to verify that the waste streams are consistent with previous samples of the same waste.

For wastes that are multi-layered, a discussion must be included explaining which layer(s) will be sampled and why. Each layer must be sampled separately.

The waste analysis plan must also address what safety precautions will be taken during the sampling of hazardous waste. The minimum protective clothing for persons collecting samples of hazardous wastes must include gloves, goggles, and boots. If hazardous vapors are possible, respiratory protection must also be available.

C-2(d) Frequency of Analysis: 724.113(b)(4)

Provide the criteria used to determine if the waste will be acceptable to the off-site recycling facility (i.e., an acceptable range of solvent content). The current state permit for Detrex, Supplemental Permit 1984-875-SP, requires a minimum solvent content of 30 percent.

Page C-11 of the application states that "before any hazardous waste material is accepted from a new customer for shipment. . . the waste is sampled." Clarify where this sampling is conducted. This preliminary assessment sampling should be conducted by Detrex personnel and the drum

Detrex Corporation
Gold Shield Solvents
0311860003
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B-113
January 4, 1991

sealed to ensure the waste is not tampered with prior to shipment to Detrex. Additional detail is required to demonstrate that the preliminary assessment sample handling between the generator's facility and the Detrex facility follows SW-846.

Prior to the shipment of any drummed waste to Detrex, a preliminary assessment must include analysis of a waste sample for specific gravity. This result must be recorded and kept in the operating record. A sample must then be sent to the laboratory and analyzed for specific gravity, ignitability, TCLP metals, and volatile organics. Analysis for specific gravity at the lab will ensure that a representative sample was received by the laboratory. These laboratory reports must also be kept as part of the operating record. If the waste contains levels of the solvents at an acceptable range as identified in the waste analysis plan, the facility may accept drums of that waste from that customer. Prior to storing drums in the hazardous waste container storage area, all drums must be analyzed for specific gravity and this number compared to the one recorded during the preliminary assessment. If a discrepancy is found, this waste must not be accepted at the facility prior to reanalysis. If the specific gravity is consistent with previous analysis, the drums may be stored at the facility while a sample is being sent off-site for analysis of volatile organics.

Upon receipt of drums from off-site, a minimum of one sample per customer and 10 percent of the containers received daily must be analyzed for volatile organics.

Once a year a sample from each waste stream from each customer must be sent off-site to the laboratory for analysis of specific gravity, volatile organics, ignitability and the TCLP metals. For existing customers, this analysis must be conducted within ninety (90) days of the effective date of this permit.

C-3 Quality Assurance: 702.145

Modify the Quality Assurance Project Plan to address Comment C-2(d) Frequency of Analysis above.

Detection limits used for the different analytical methods must be specified. Percentages are not acceptable. To demonstrate an organic parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846. Detrex has not demonstrated that the proposed method for the determination of solvents in spent solvents is an equivalent testing method to the SW-846 test methods.

Section 2.1 indicates an analysis for stabilizer components content will be conducted. Provide information on this procedure, including the method that will be used.

The frequency of duplicate, blank and spiked samples must be consistent with SW-846. SW-846 requires that these procedures be performed at least once with each analytical batch with a minimum of once per twenty samples. Modify the Quality Assurance Project Plan to address this.

Section 5.3.2 Composite Liquid Concentrated Waste Samples must be removed from the Quality Assurance Project Plan. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method.

Section 5.3.3 Equipment Decontamination indicates that "the glass thief is decontaminated between each set of drum samples that are collected from a similar waste type. Decontamination consists of rinsing the glass thief with pure solvent of the same type as the solvent waste that is to be sampled." This section must be modified to include decontamination of equipment that will be used for different waste types. If a solvent will be used for decontamination, discuss the precautions that will be used to ensure the proper solvent is used.

Provide a sample copy of the sample container labels. A copy was not provided with the response to the first technical review.

The Table of Contents for the Quality Assurance Project Plan indicates there is a Section 8.2 Flash Point. This section was not included in the submittal. Clarify this discrepancy. All waste streams should be analyzed for ignitability at least once a year.

D. PROCESS INFORMATION

D-1 Containers

D-1(a)(3) Requirements for the Base or Liner to Contain Liquids: 724.275(a)(1)

Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and sides of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate that the coating is compatible with all wastes to be stored in the unit.

G. CONTINGENCY PLAN

The contingency plan must include the necessary information and descriptions to satisfy the requirements of 35 Ill. Adm. Code Part 724.156. The contingency plan must be revised to demonstrate that the following information was considered, at a minimum.

- a. The hazardous substance information forms in Appendix A of Attachment G-5 indicate that 1,1,1-trichloroethane could be explosive. Provide the explosive limits for 1,1,1-trichloroethane.
- b. The hazardous substance information forms do not indicate if trichloroethylene has any toxic byproducts. This form must be revised to indicate if toxic byproducts are possible, and if so what they are.
- c. The hazardous substance information forms do not indicate if perchloroethylene is explosive or has any radioactive hazards. This section must be completed. If perchloroethylene could be explosive, provide the explosive limits.
- d. The hazardous substance information forms do not indicate if a radioactive hazard exists for trichlorofluoroethane. Provide this information.
- e. Detrex must determine the concentrations of the hazardous constituents stored at the facility and possible byproducts that could reach the residential properties and the industrial area adjacent to the facility during a release, fire, and/or an explosion. This determination must also be made at the Detrex facility to protect workers and emergency responders to the release, fire, and/or explosion. This information must be used to determine the extent of an evacuation area.
- f. Define what is meant by the Threshold Limit Value. For the hazardous constituents stored at the facility and possible byproducts, the evaluation must compare the exposure guidelines to the estimated concentrations obtained above (Comment G.e.). If exposure standards are available, they should be used in this evaluation.
- g. The contingency plan must include the criteria that will be used to determine if a release, fire, and/or explosion could threaten human health or the environment. This determination must also take into account the capabilities of emergency equipment at the site.

Detrex must also determine the length of time that surrounding facilities and residents would have to evacuate prior to a direct uncontrolled impact on human health and the environment from a release, fire, and/or explosion.

- h. Additional detail must be provided to determine when the fire department with the assistance of the Emergency Coordinator will evacuate the facility and the surrounding area (i.e., wind, chemicals involved, potential byproducts, volume, fire, explosion, etc.).

In addition, Detrex should computerize their waste storage (amount, storage location, generator location, description and hazardous waste I.D. number) to be better prepared for emergencies. Detrex has not demonstrated that the existing log book provides all of this information. Detrex should be able to determine the contents of a drum by its location within the hazardous waste storage area.

H. PERSONNEL TRAINING

H-1b Training Content, Frequency and Techniques : 724.116(c) and (d)(3)

The standard operating procedures for each individual job task related to hazardous waste management must be incorporated into the training manual.

I. CLOSURE PLANS AND POST-CLOSURE PLANS

I-4 Closure Cost Estimate: 703.183(o), 724.242

Cost estimates must be based on third party costs and cannot include salvage value for sale of hazardous wastes. The cost estimate for disposal of the maximum inventory of waste is not adequate. This cost should be approximately \$300/drum. This cost should also be used for disposal of the wash water. Soil and rinseate sampling should be approximately \$1200/sample, because of the new requirements for analysis of TCLP parameters. The cost estimate also does not include any disposal of contaminated soil and/or concrete.

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

I-5e Financial Test and Corporate Guarantee for Closure: 724.243(f), 724.251(f)

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form. This form must also incorporate the latest closure costs (see also Comment I-4 above).

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

I-8 Liability Requirements: 703.183(g), 724.247

I-8(a)(2) Financial Test for Liability coverage: 724.247(b)(2), 724.247(f)

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form.

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required.

AD/mls/sp4494n/4-10



PRIOR CONDUCT CERTIFICATION EVALUATION FOR RCRA HAZARDOUS WASTE FACILITY PERSONNEL

Owner/Operator Name: _____ Social Security No. _____

Address: _____

Site Name: _____ Site Code _____

I. Other hazardous waste sites owned or operated (anywhere) at anytime. (If more than one, attach the name, address and nature of each site.)

Site Name: _____ Site Code _____

Site Address: _____

II. All of the following questions need to be answered. If the answer to any of the following is affirmative attach a copy of any final administrative or judicial determination.

- | | | | |
|----|---|------------------------------|-----------------------------|
| 1) | Have you ever violated any federal, state, or local laws, regulations or ordinances governing the operation of any waste disposal site? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| 2) | Have you ever been convicted in Illinois or any other state of any crime which is a felony under Illinois law or been convicted of a felony in a federal court? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| 3) | Have you ever been proven to have shown gross carelessness in the handling, storing, processing, transporting or disposing of any hazardous waste in any state? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |

III. Is there any administrative or judicial proceeding, which is still pending, which:

- | | | | |
|----|--|------------------------------|-----------------------------|
| 1) | Could result in a determination of the type described in section II above; or | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| 2) | Could result in the reversal of any administrative or judicial determination provided in response to section II above. | YES <input type="checkbox"/> | NO <input type="checkbox"/> |

If the answer to any of the above is yes provide a description including the name of the Agency or Court, title, docket No. and status.

CERTIFICATION STATEMENT

I certify under penalty of law that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Signature of Applicant

Title

Date

For Agency Use Only

Log No. PCC- _____
Final Action _____

Date Received: _____
Date: _____

LWE:jd/0412k/sp
IL 532 1905
LPC 372 (REV. 10/90)

COMPLETING THE FORM

As part of the IEPA review of Part B permit applications, the Illinois Environmental Protection Act (Sec. 39(i)) requires that an investigation of the owner/operators prior experience be conducted. Therefore any official representative of the applicant who is considered authorized to sign applications, must complete and submit the attached form. Those persons authorized to sign applications are identified in 35 IAC 702.126. In responding please identify all the authorized official representatives of the applicant, and their titles in a cover letter, and attach their completed prior conduct forms. For example, a corporation should identify the president, vice president, secretary and treasurer, and any other person who performs similar policy or decision making functions. Failure to comply with this request will result in a delay in the processing of a Part B, and may result in denial.

General: Provide the owner/operator's name, Social Security number, and address as well as the site name and site code. The site name should be the same as the name on the most recent operating permit.

Part I: Information on ownership and/or operation of other waste disposal sites, even if located in other states, must be provided. If more than one additional site is owned/operated, attach this information.

Part II: This part of the application deals with the operator's prior conduct, in other states as well as in Illinois. If there is any confusion on completing this part, the operator should attach a complete explanation as well as any supporting documentation. This part (and part III) applies to hazardous and non-hazardous facilities.

Part III: This part deals with pending actions which could impact the application. If final decisions are reached during the certification review it is the operator's responsibility to provide supplemental information within 30 days.

An original and two copies of all applications shall be submitted by registered or certified mail to:

Illinois Environmental Protection Agency
Division of Land Pollution Control - #24
Prior Conduct Certification Review
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

LE:/0412k,2.sp

Part B-113

CRA

Consulting Engineers

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1C2
(519) 884-0510

October 5, 1990

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
USA 62794-9276

RECEIVED
DEC 20 1990
OFFICE OF EPA
Waste Management Division
REGION V

Dear Mr. Eastep:

Re: Detrex Corporation Gold Shield Solvents
Part B Permit Application
Melrose Park Facility (EPA I.D. No. ILD 074424938)

On behalf of Detrex Corporation, please find enclosed an original and three copies of Attachment G-5 of the Part B Permit Application to the above referenced facility.

This material was inadvertently left out of the material submitted to your attention on October 1, 1990.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Bruce McConnell, P.Eng.
BMC/cdd/6

Encl.

c.c. Mr. C.U. Guy (2 copies)
Mr. Dan Anderson

RECEIVED

OCT 10 1990

IEPA-DLPC

7

Part B 113

CRA

Consulting Engineers

USEPA

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1C2
(519) 884-0510

October 1, 1990

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
USA 62794-9276

Dear Mr. Eastep:

Re: Detrex Corporation Gold Shield Solvents
Part B Permit Application
Melrose Park Facility (EPA I.D. No. ILD 074424938)

On behalf of Detrex Corporation, please find enclosed an original and three copies of responses to the Illinois Environmental Protection Agencies' (IEPA) Notice of Deficiencies, First Technical Review dated July 30, 1990.

The attached addresses each IEPA comment individually. Also attached is a cross-reference list and all revised/new information for inclusion into the Part B Permit Application. Each revised page and drawing has a revision date identified on them.

The IEPA has provided significant technical comments on Detrex's Waste Characterization. Detrex and CRA feel it would be very beneficial to schedule a meeting at your convenience to discuss the IEPA comments. With regards to this, CRA has not incorporated the responses to specific IEPA comments on Waste Characterization into the permit application. Specific responses have been provided in the attached. Subsequent to a proposed meeting with IEPA, appropriate revisions to the Waste Characterization section will be made, based on the discussions during the meeting. We believe a meeting will serve to clarify any remaining IEPA comments in the most expeditious manner.

Should you have any questions, require additional information or wish to schedule a meeting to discuss the attached material, please contact Mr. C.U. Guy

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RECEIVED

OCT 2 1990

IEPA-DLPC

October 1, 1990

Reference No. 2471

-2-

(Detrex Corporation Manager of Environmental Compliance at 216-997-6131) or the undersigned at your convenience .

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in black ink, appearing to read "Bruce McConnell", with a large, sweeping flourish extending to the right.

Bruce McConnell, P.Eng.

BMC/jdh/5
Encl.

c.c. Mr. C.U. Guy (2 copies)
Mr. Dan Anderson

RESPONSES TO IEPA

July 30, 1990 NOD

RECEIVED

OCT 2 1990

IEPA-DLPC

October 1, 1990

Reference No. 2471

A. **Part A Application: 702.123, 702.126(a) and (d), 703.181**

Comment #1

- The facility contact listed on Form 1 must be changed to Mr. Dan Anderson, the current Branch Manager.
- Page 4 of 5, Section VII of Form 3 must be completed.
- Page 4 of 5, Section VIII of Form 3 must be completed.

Response #1

- The facility contact has been corrected and facility location and ownership information provided on a revised Part A Application. The forms have been signed by Detrex (i.e. operator) and arrangements are being made for the owner of the property to provide the required certification. This corrected Part A Application and the new certification page for the Part B Permit will be forwarded as soon as possible.

C. **WASTE CHARACTERISTICS**

Comment #2

C-2(a) **Parameters and Rationale: 724.113(b) (1)**

- On Page C-9, the last sentence of paragraph 3 must be revised to state "properly processed". (emphasis added)

Response #2

- This typographical error has been corrected.

RECEIVED
OCT 2 1990
IEPA-DLPC

Comment #3**C-2(b) Test Methods: 724.113(b) (2)**

- Test method for volatile organics used to test for the parameters chosen must reference the EPA Test No. in SW-846 (Third Edition). Revise the test methods to use only SW-846 methods.
- Page C-11 of the application states that if the flammable portion of the waste sample exceeds 10 percent by volume, the distillate portion of the waste will be analyzed for ignitability. Describe how this determination will be made and demonstrate that this analysis will be completed prior to storage of the wastes in the container storage area.
- The reference to the flammable portion of the waste sample was inadvertent in the original permit application submittal. All of the wastes handled by Detrex are non-flammable. Hence, testing for flammability during waste characterization is not required. On occasion flammability testing is conducted on recovered solvent after the distillation operation as a quality control test on the stabilizer components. This is a process control test to ensure the quality of solvents sold by Detrex, not a waste characterization test.

Response #3

- The test method for volatile organics used at Detrex's analytical laboratory is a modification of SW-846 methods 8010 and 8015. The modification allows for the analysis of percentage levels of halogenated and non-halogenated solvents in a spent solvent matrix. The use of standard SW-846 methods would require that each sample received an extremely high dilution in order to lower the major sample parameter(s) into the working range of testing instrumentation.

The above, and the fact that standard SW-846 test methods typically have a narrow linear detection range (two orders of magnitude) would create an extreme dilution error and may result in minor sample parameter(s) being diluted below method detection levels.

RECEIVED

OCT 2 1990

IEPA-DLPC

The test method for determination of non-volatile residue (NVR) does not have an SW-846 equivalent. The method SOP is provided as an Appendix in the Quality Assurance Project Plan.

- The reference to the flammable portion of the waste sample was inadvertent in the original permit application submitted. All of the wastes handled by Detrex are non-flammable. Hence, testing for flammability during waste characterization is not required. On occasion flammability testing is conducted on recovered solvent after the distillation operation as a quality control test on the stabilizer components. This is a process control test to ensure the quality of solvents sold by Detrex, not a waste characterization test.

Comment #4

C-2(c) Sampling Methods: 724.113(b) (3)

- The sampling protocol used at the facility must be consistent with SW-846 to ensure samples received at the labs are representative of the wastes to be stored in the container storage area.
- Table 5.1 of the Laboratory Quality Assurance Project Plan states the sample containers will use a polyethylene-lined closure. However, SW-846 recommends the use of a teflon liner. Modify the sampling procedures to use SW-846 procedures.
- In addition, care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Modify the sampling protocol in the waste analysis plan to address this issue.
- The sampling protocol does not specify the location where the drums will be sampled. It is unclear if the drums will be sampled on the loading dock prior to transportation to the hazardous waste storage area. Clarify this issue.
- For wastes that are multi-layered, a discussion must be included explaining which layer(s) will be sampled and why.

- The waste analysis plan must also address what safety precautions will be taken during the sampling of hazardous waste.

Response #4

- The sampling protocols used at the facility are appropriate for collecting representative samples of the solvent wastes. This is further clarified in the following responses.
- The use of teflon-lined closures (lids) has been recommended in SW-846 due to the chemical inertness of teflon material. The use of a teflon liner is to prevent material from the lid from getting into the sample and interfering with the analyses. The primary contaminants associated with the lid are reported in SW-846 to be phthalate esters and hydrocarbons that may interfere with semi-volatile analyses. These would not interfere with volatile analyses. Thus, polyethylene - lined closures are suitable for the samples analyzed by Detrex. Historical use of these lids has not interfered with the analysis of spent solvents.
- The samples being collected for volatile organic compound analysis are concentrated waste samples. As specified in Table 4.1 of SW-846, the recommended container is a wide mouth jar which is difficult, if not impossible, to fill leaving no head space. Consequently, entrained air and headspace appear to be of little concern when sampling and analyzing concentrated waste samples for volatile organics. In addition, concentrated waste samples require no preservation as specified in Table 4.1 of SW-846 which implies that enhanced volatilization attributed to elevated temperatures is also of little concern.

The composite sampling technique has typically been used to obtain a representative sample of a waste stream over time or wastes generated from the same process that have been stored in individual containers. Composite sampling will provide a more representative (ie. more accurate) sample than a grab sample from a subset of the containers of waste.

From the information provided in Table 4.1 of SW-846 and the above discussion, composite sampling of the concentrated wastes contained in the individual containers is technically sound.

- All drums are sampled after they have been removed from the loading dock and placed within the secondary containment system.
- The glass thief sampling device is utilized to collect a representative sample of waste from each drum. Layers, should they exist, are not sampled separately.
- Sampling personnel wear company issued uniforms and rubber gloves while sampling.

Comment #5

C-2(d) Frequency of Analysis: 724.113(b) (4)

- Provide the criteria used to determine if the waste will be acceptable to the off-site recycling facility (i.e., an acceptable range of solvent content).
- Prior to the shipment of any waste to the facility, a sample must be analyzed for specific gravity. This result must be recorded and kept in the operating record. A sample must then be sent to the laboratory and analyzed for specific gravity and volatile organics. Analysis for specific gravity at the lab will ensure that representative sample was received by the laboratory. These laboratory reports must also be kept as part of the operating record. If the waste contains levels of the solvents at an acceptable range as identified in the waste analysis plan, the facility may accept drums of that waste from that customer. Prior to storing drums in the the hazardous waste container storage area, all drums must be analyzed for specific gravity and this number compared to the one recorded during the preliminary assessment. If a discrepancy is found, this waste must not be accepted at the facility prior to reanalysis. If the specific gravity is consistent with previous analysis, the drums may be stored at the facility while a sample is being sent off-site for analysis of volatile organics.
- Upon receipt of drums from off-site, a minimum of one sample per customer and 10 percent of the containers received daily must be analyzed for volatile organics.

Response #5

- All F001 and F002 solvent wastes received at the facility are acceptable to the off-site recovery facility if the wastes meet the requirements of the waste analysis plan. Waste of minimal solvent content simply does not produce a high volume of recovered solvent during processing at the off-site recovery facility.
- Detrex completes a thorough review of a potential waste suppliers (i.e. customer's) waste generation process and waste characterization prior to authorizing a facility to accept wastes from the customer. The use of the specific gravity test is essentially a preliminary indicator that the customer has properly identified the waste solvent (i.e. TCE not Methylene Chloride). The specific gravity test's primary use is for process information and for accounting purposes.

Detrex does not sample and test wastes for specific gravity prior to shipment of the waste to the facility. Sampling and testing equipment is maintained at the Detrex facility and all wastes are sampled upon receipt at the facility for both specific gravity and volatile organics. If the results of the specific gravity test indicate the waste has been properly identified a sample is shipped to the laboratory for volatile organic analysis. The drum is stored in the container storage area pending receipt of analytical results. A specific gravity test is not typically completed by the Detrex laboratory. The sampling method is appropriate for the wastes being sampled and care is taken to ensure proper labelling and control of samples.

- As discussed in the response to IEPA comment #4, the compositing sampling procedure following by Detrex is appropriate.

Comment #6

C-2(g) Waste Analysis Requirements for Land Disposal Ban: 728.150

- On page C-13, the last paragraph must be revised to state "accept the waste for reclamation." (emphasis added)

Response #6

- This typographical error has been corrected.

Comment #7

C-3 Quality Assurance: 702.145

- Modify the Quality Assurance Project Plan to address comment C-2(d) Frequency of Analysis above.
- Detection limits used for the different analytical methods must be specified. Percentages are not acceptable. To demonstrate an organics parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846.
- Section 2.1 indicates an analysis for stabilizer components content and percent non-volatile residue will be conducted. Provide information on these procedures, including the methods that will be used.
- The frequency of duplicate, blank and spiked samples must be consistent with SW-846. SW-846 requires that these procedures be performed at least once with each analytical batch with a minimum of once per twenty samples. Modify the Quality Assurance Project Plan to address this.
- Section 5.3.2 Composite Liquid Concentrated Waste Samples must be removed from the Quality Assurance Project Plan.
- Section 5.3.3 Equipment Decontamination must be modified to address decontamination of equipment that will be used for different waste types. If a solvent will be used for decontamination, discuss the precautions that will be used to ensure the proper solvent is used.
- Provide a sample copy of the sample container labels.
- The Table of Contents for the Quality Assurance Project Plan indicates there is a Section 8.2 Flash Point. This section was not included in the submittal. Clarify this discrepancy.

Response #7

- As discussed in the response to IEPA comment #4, the sampling frequency followed by Detrex is believed to be appropriate. Thus no modifications to frequency of analysis in the QAPP is required.
- As stated in SW-846, practical quantitative limits are highly matrix dependent and are presented for guidance and may not always be achievable. The concentrated waste matrix of the samples analyzed by the laboratory are composed of high percentage levels of the primary constituent. To analyze this compound by SW-846 method 8015 for non-water miscible wastes will require that the sample be diluted in order to bring the compound into the working range of the instrument. All other compounds of interest will be diluted by the same factor as the primary constituent. In addition, Practicle Quantification Limits (PQLs) for all the analyses of interest will be raised by the same factor. A typical example follows:

The PQL for trichloroethylene (TCE) in non-water miscible waste is 0.15 mg/l (from SW-846)

Linear working range for instrument is 0.15 mg/l to 30 mg/l for TCE (directly injected into gas chromatograph)

A typical spent solvent waste sample contains 30% TCE (wt/vol) or 300,000 mg/l.

Therefore, the sample must be diluted by a factor of 10,000 to bring the concentration of TCE into the upper end of the working range of the instrument.

All other analytes of interest will receive the same dilution and their respective PQLs will be raised by the same factor. While analyzing less dilute aliquots of the sample will lower the PQLs to some extent, saturation of the detector will eventually occur and the resulting overlap of peaks will make detection and quantitation impossible. Consequently, elevated PQLs are unavoidable by the SW-846 technique.

It should also be noted that a high level of error is present when making any dilutions. The magnitude of error is even greater when extremely

large dilutions are made. The method utilized by Detrex and presented as an Appendix to the QAPP avoids dilution error by desensitizing the instrument. This allows undiluted samples to be injected directly into the gas chromatograph for separation and detection.

- The Standard Operating Procedures (SOPs) for analysis of stabilizer components content and percent non-volatile residues were provided as an Appendix to the QAPP.
- The analytical methods and corresponding quality control procedures have been designed by Detrex laboratory staff based on historical results. Detrex maintains that the frequency of analytical quality control testing is adequate for the type of analyses conducted.
- The samples collected by Detrex are composite liquid concentrated waste samples, therefore, Section 5.3.2 of the QAPP must remain
- It must be recognized that samples collected by Detrex for organic analysis have high percentage levels of solvent content. Thus, the potential for trace amounts of contaminants, which may be present on the glass thief sampling device, to impact analytical results is extremely remote. Sampling personnel rinse the glass thief in the drum to be sampled prior to actually collecting a sample for volatile organic analysis.

A strict decontamination protocol requiring sampling personnel to clean the glass thief in pure solvent is not warranted. The decontamination procedure would require personnel to handle virgin solvents and generate further solvent wastes while not providing any increased accuracy in analytical results.

- A sample copy of the sample container labels is attached to these responses.
- As discussed in response #3, Detrex does not test for flammability of incoming solvent wastes since the wastes are not flammable. the reference to flammability testing (ie. flash point) was inadvertent in the original permit application submission.

D. PROCESS INFORMATION

Comment #8

D-1 Containers

D-1a(2) Container Management Practices: 724.273

- Attachment D-1 must be modified to show the revised container storage area location.

Response #8

- The outline of the hazardous waste container storage area on Attachment D-1 has been corrected. The outline has also been corrected for consistency on all other attachment figures throughout the permit application.

Comment #9

D-1(a) (3) Requirements for the Base or Liner to Contain Liquids:
724.275 (a) (1)

- Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and side of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate that the coating is compatible with all wastes to be stored in the unit.
- In addition, the height of the curbing at the security door on the north end of the building, to maintain secondary containment for the container storage area, must be provided.

Response #9

- CRA and Detrex have been reviewing available sealant technologies. A suitable sealant which is compatible with the waste in storage and practical from an operational point of view has not been located. The review will

continue and a plan of compliance submitted to IEPA as soon as a practical solution is found. Any input from IEPA on sealants which have been approved for other facilities would be appreciated.

- The curbing at the security door on the north end of the building is 3 1/2 inches high in order to maintain secondary containment.

Comment #10

D-1 (a) (3) (c) Containment System Capacity: 703.201 (a) (3), 724.275 (b) (3)

- The secondary containment system capacity calculations must be revised to include the waste drums stored within the hazardous waste container storage area, in addition to any product and empty drums stored within that area.

Response #10

- The secondary containment volume calculation in Attachment D-3 has been revised. The wastes drums stored within the hazardous waste container storage area have been included by subtracting the entire area covered by 4'x4' wooden pallets from the secondary containment system. This provides a very conservative estimate of secondary containment capacity of 5,948 gallons which is equivalent to 21.6 percent of the total maximum hazardous waste inventory. —

G. CONTINGENCY PLAN

Comment #11

- The contingency plan must include the necessary information and descriptions to satisfy the requirements of 35 IAC Part 724.156. In order to develop the necessary information, Detrex must perform a hazard evaluation of the hazardous waste management activities associated with the container storage area. Such an evaluation must consider the following at a minimum:

- a. type, amount, and variety of waste in the container storage area,

- b. location of waste,
- c. waste handling practices,
- d. possible hazards that may result from a release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions),
- e. the effects of weather conditions in the event of a release, fire, or explosion,
- f. identify the possible hazards to human health or the environment (on site and off site) that may result from a release, fire, or explosion,
- g. describe how the emergency coordinator (EC) will determine if a release, fire, or explosion could threaten human health or the environment outside the facility. Identify the type of information and criteria the EC would use in arriving at such a determination. In addition, estimate the time it would take to make such a determination and compare that to the time it would take material resulting from a release, fire, or explosion to travel off site.
- h. How will the EC determine if evacuation of local areas may be advisable? As in g. above, identify the type of information and criteria the EC will use and make a time comparison of the time necessary to make such a determination to the time an off-site impact is estimated to occur.
- i. Who will the EC notify if evacuation of the local areas is determined to be advisable?

In addition, Detrex must computerize their waste storage (amount, storage location, generator location, description and hazardous waste I.D. Number) to be better prepared for emergencies.

Response#11

- The necessary information requested by IEPA has been provided as a new attachment to the Contingency Plan. The Contingency Plan Hazard Evaluation has been structured to follow the form presented in the IEPA comments.
- Detrex does not believe that computerizing their waste storage would in any way make the facility better prepared to respond to an emergency. The facility maintains a log book in the office which has an accurate inventory of all wastes in the container storage area by waste type. This log book is readily available at all times in the event of an emergency. Computerizing this sytem would require purchasing equipment and software as well as training staff to use the system while providing no additional information to that already maintained in the log book.

H. PERSONNEL TRAINING

Comment #12

H-1b Training Content, Frequency and Techniques: 724.116 (c) and (d) (3)

- The standard operating procedures for each individual job task related to hazardous waste management must be incorporated into the training manual.

Response #12

- Detrex Corporations Corporate Training Director (Mr. Bill Moore) is currently developing specific standard operating procedure (SOP) descriptions for individual job tasks. These will be appended to the personnel training program, and provided to IEPA, as soon as they become available.

Comment #13

H-2 Implementation of Training: 724.116 (b), (d) (4) and (e)

- The application does not demonstrate that training has been successfully completed by facility personnel. Provide examples of log sheets or training rosters which are filled out to show training has taken place. Training rosters and/or log sheets should be signed by employees and dated.

Response #13

- Training acknowledgement forms are signed by facility personnel after the completion of initial or annual refresher training. Copies of these acknowledgement forms are maintained on file at the facility. Copies have been added as Attachment H-4 to the permit application.

I. CLOSURE PLANS AND POST CLOSURE PLANS

Comment #14

I-1 Closure Plans

- On Page I-5, the last paragraph must be revised to state an "independent registered professional engineer" will be used. (emphasis added)

Response #14

- This typographical error has been corrected.

Comment #15

I-1d(1) Closure of Containers: 724.278

- Page I-8a states the cleanup level will be the appropriate "HCL". Define what is meant by a "HCL".

Response #15

- The reference should have been to the appropriate "MCL" (i.e. Maximum Contaminant Level). This change has been made on page I-8a.

Comment #16

I-5 **Financial Assurance Mechanism for Closure:**
703.183 (o), 724.243

I-53 **Financial Test and Corporate Guarantee for Closure:**
724.243 (f), 724.251 (f)

- The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form. This form must also incorporate the latest closure costs.
- Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant.
- If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

Response #16

- A letter from Detrex's chief financial officer on the appropriate IEPA form was submitted on July 10, 1990.

Comment #17

I-8 Liability Requirements: 703.183 (g), 724.247

I-8 (a) (2) Financial Test for Liability Coverage: 724.247 (b) (2), 724.247 (f)

- The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form.
- Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worked as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required.

Response #17

- A letter from Detrex's chief financial officer on the appropriate IEPA form was submitted on July 10, 1990.

Bob



DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111

September 24, 1990

FAX: (313) 358-5803

TELEPHONE:
(313) 358-5800

Viva: Federal Express

Executive Director
Region V Office
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Facility Permit 0980-44-OP
Supplemental Permit No. 1984-875-SP
Detrex Corporation
2537 LeMoyne
Melrose Park, IL 60160

Dear Sir,

Pursuant to 40 CFR 261 revision Thursday March 29, 1990
Federal Register regarding the Toxicity Characteristic
Leaching Procedure (TCLP), we are here by making
notification, as required by 40 CFR 270.42 Class 1
Modification, of the addition organic chemicals that effect
our facility because of this rule.

<u>EPA No.</u>	<u>Constitute</u>	<u>CAS Number</u>
D004	Arsenic	7440-38-2
D005	Barium	7440-39-3
D018	Benzene	71-43-2
D006	Cadmium	7440-43-9
D019	Carbon Tetrachloride	56-23-5
D021	Chlorobenzene	108-90-7
D022	Chloroform	67-66-3
D007	Chromium	7440-47-3
D027	1,4-Dichlorobenzene	106-46-7
D028	1,2-Dichloroethane	107-06-2
D029	1,1-Dichloroethylene	75-35-4
D030	2,4-Dinitrotoluene	121-14-2
D034	Hexachloroethane	67-72-1
D008	Lead	7439-92-1
D009	Mercury	7439-97-6
D035	Methyl Ethyl Ketone	78-93-3
D036	Nitrobenzene	98-95-3
D038	Pyridine	110-86-1
D010	Selenium	7782-49-2
D011	Silver	7440-22-4

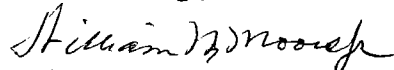
D039	Tetrachloroethylene	127-18-4
D040	Trichloroethylene	79-01-6
D043	Vinyl Chloride	75-01-4

These chemicals are being added since they are used as additives, cleaning agents, or are currently on our permit as other EPA listed waste; IE F-002 waste, which we are currently permitted for.

We are here by also notifying all persons or agencies as specified under 40 CFR 270.42 (a)(ii) of this modification.

If additional information is needed, or required please contact me at the above number and address.

Sincerely,



William M. Moore, Jr.
Corporate Risk Management
Environmental RCRA Compliance

cc: R. Jones
I. Shamiyeh
M. Tepatti
D. Anderson
Illinois EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

Telephone Call

DATE: 10/2/90

SUBJECT: Detrex (Gold Shield Solvents)

FROM: George Hamper

TO: William M. Moore, Jr.

I called to tell him that he should have submitted a revised Part A rather than a Class I permit modification request, because we have not made a final permit decision on Detrex's Part B application yet.



Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311860003 -- Cook County
Detrex Corporation
ILD074424938
RCRA Permit Log No. 113

July 30, 1990

Detrex Corporation
Mr. Daniel Anderson
Branch Manager
2537 Le Moyne Avenue
Melrose Park, Illinois 60160

Detrex Corporation
Mr. C. U. Guy
Manager of Environmental Compliance
P.O. Box 1398
Ashtabula, OH 44004

Gentlemen:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for one (1) hazardous waste container storage unit (S01) dated May 23, 1990 and received May 24, 1990 for the above-referenced facility. A list of the deficiencies identified during this first technical review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the technical review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 IAC Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than September 10, 1990. Failure to submit a complete and technically adequate response by that date may result in a Notice of Intent to Deny your application for permit pursuant to 35 IAC Part 705. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

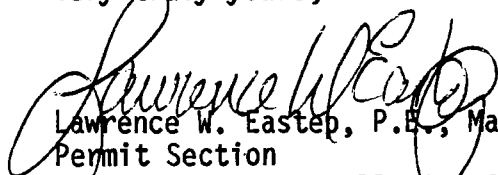
4



Page 2

If you have any questions or wish to have a meeting regarding this subject, feel free to contact Amy Dragovich of my staff at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

ALO
LWE:ALD:rd2544n/68-69

Enclosure

cc: Division File, w/enclosure
Maywood Region, w/enclosure
George Hamper, USEPA Region V, w/enclosure
Bruce McConnell, P.E., w/enclosure
Amy Dragovich, w/enclosure
Administrative Record, w/enclosure



Notice of Deficiencies
First Technical Review
Part B Log #113

Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

0311860003
ILD074424938
July 30, 1990



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Subject Requirements: 35 Illinois Administrative Code Subtitle G.

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

The facility contact listed on Form 1 must be changed to Mr. Dan Anderson, the current Branch Manager.

Page 4 of 5, Section VII of Form 3 must be completed.

Page 4 of 5, Section VIII of Form 3 must be completed.

C. WASTE CHARACTERISTICS

C-2(a) Parameters and Rationale: 724.113(b)(1)

On Page C-9, the last sentence of paragraph 3 must be revised to state "properly processed". (emphasis added)

C-2(b) Test Methods: 724.113(b)(2)

Test methods used to test for the parameters chosen must reference the EPA Test No. in SW-846 (Third Edition). Revise the test methods to use only SW-846 methods.

Page C-11 of the application states that if the flammable portion of the waste sample exceeds 10 percent by volume, the distillate portion of the waste will be analyzed for ignitability. Describe how this determination will be made and demonstrate that this analysis will be completed prior to storage of the wastes in the container storage area.

C-2(c) Sampling Methods: 724.113(b)(3)

The sampling protocol used at the facility must be consistent with SW-846 to ensure samples received at the labs are representative of the wastes to be stored in the container storage area.

Table 5.1 of the Laboratory Quality Assurance Project Plan states the sample containers will use a polyethylene-lined closure. However, SW-846 recommends the use of a teflon liner. Modify the sampling procedures to use SW-846 procedures.



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In addition, care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Modify the sampling protocol in the waste analysis plan to address this issue.

The sampling protocol does not specify the location where the drums will be sampled. It is unclear if the drums will be sampled on the loading dock prior to transportation to the hazardous waste storage area. Clarify this issue.

For wastes that are multi-layered, a discussion must be included explaining which layer(s) will be sampled and why.

The waste analysis plan must also address what safety precautions will be taken during the sampling of hazardous waste.

C-2(d) Frequency of Analysis: 724.113(b)(4)

Provide the criteria used to determine if the waste will be acceptable to the off-site recycling facility (i.e., an acceptable range of solvent content).

Prior to the shipment of any waste to the facility, a sample must be analyzed for specific gravity. This result must be recorded and kept in the operating record. A sample must then be sent to the laboratory and analyzed for specific gravity and volatile organics. Analysis for specific gravity at the lab will ensure that a representative sample was received by the laboratory. These laboratory reports must also be kept as part of the operating record. If the waste contains levels of the solvents at an acceptable range as identified in the waste analysis plan, the facility may accept drums of that waste from that customer. Prior to storing drums in the hazardous waste container storage area, all drums must be analyzed for specific gravity and this number compared to the one recorded during the preliminary assessment. If a discrepancy is found, this waste must not be accepted at the facility prior to reanalysis. If the specific gravity is consistent with previous analysis, the drums may be stored at the facility while a sample is being sent off-site for analysis of volatile organics.

Upon receipt of drums from off-site, a minimum of one sample per customer and 10 percent of the containers received daily must be analyzed for volatile organics.



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C-2(g) Waste Analysis Requirements for Land Disposal Ban: 728.150

On Page C-13, the last paragraph must be revised to state "accept the waste for reclamation." (emphasis added)

C-3 Quality Assurance: 702.145

Modify the Quality Assurance Project Plan to address comment C-2(d) Frequency of Analysis above.

Detection limits used for the different analytical methods must be specified. Percentages are not acceptable. To demonstrate an organic parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846.

Section 2.1 indicates an analysis for stabilizer components content and percent non-volatile residue will be conducted. Provide information on these procedures, including the methods that will be used.

The frequency of duplicate, blank and spiked samples must be consistent with SW-846. SW-846 requires that these procedures be performed at least once with each analytical batch with a minimum of once per twenty samples. Modify the Quality Assurance Project Plan to address this.

Section 5.3.2 Composite Liquid Concentrated Waste Samples must be removed from the Quality Assurance Project Plan.

Section 5.3.3 Equipment Decontamination must be modified to address decontamination of equipment that will be used for different waste types. If a solvent will be used for decontamination, discuss the precautions that will be used to ensure the proper solvent is used.

Provide a sample copy of the sample container labels.

The Table of Contents for the Quality Assurance Project Plan indicates there is a Section 8.2 Flash Point. This section was not included in the submittal. Clarify this discrepancy.

D. PROCESS INFORMATION

D-1 Containers



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D-1a(2) Container Management Practices: 724.273

Attachment D-1 must be modified to show the revised container storage area location.

D-1(a)(3) Requirements for the Base or Liner to Contain Liquids:
724.275(a)(T)

Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and sides of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate that the coating is compatible with all wastes to be stored in the unit.

In addition, the height of the curbing at the security door on the north end of the building, to maintain secondary containment for the container storage area, must be provided.

D-1(a)(3)(c) Containment System Capacity: 703.201(a)(3), 724.275(b)(3)

The secondary containment system capacity calculations must be revised to include the waste drums stored within the hazardous waste container storage area, in addition to any product and empty drums stored within that area.

G. CONTINGENCY PLAN

The contingency plan must include the necessary information and descriptions to satisfy the requirements of 35 IAC Part 724.156. In order to develop the necessary information, Detrex must perform a hazard evaluation of the hazardous waste management activities associated with the container storage area. Such an evaluation must consider the following at a minimum:

- a. type, amount, and variety of waste in the container storage area,
- b. location of waste,
- c. waste handling practices,
- d. possible hazards that may result from a release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions),



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- e. the effects of weather conditions in the event of a release, fire, or explosion,
- f. identify the possible hazards to human health or the environment (on-site and off-site) that may result from a release, fire, or explosion,
- g. describe how the emergency coordinator (EC) will determine if a release, fire or explosion could threaten human health or the environment outside the facility. Identify the type of information and criteria the EC would use in arriving at such a determination. In addition, estimate the time it would take to make such a determination and compare that to the time it would take material resulting from a release, fire, or explosion to travel off-site.
- h. How will the EC determine if evacuation of local areas may be advisable? As in g. above, identify the type of information and criteria the EC will use and make a time comparison of the time necessary to make such a determination to the time an off-site impact is estimated to occur.
- i. Who will the EC notify if evacuation of the local areas is determined to be advisable?

In addition, Detrex must computerize their waste storage (amount, storage location, generator location, description and hazardous waste I.D. Number) to be better prepared for emergencies.

H. PERSONNEL TRAINING

H-1b Training Content, Frequency and Techniques: 724.116(c) and (d)(3)

The standard operating procedures for each individual job task related to hazardous waste management must be incorporated into the training manual.

H-2 Implementation of Training: 724.116(b), (d)(4) and (e)

The application does not demonstrate that training has been successfully completed by facility personnel. Provide examples of log sheets or training rosters which are filled out to show training has taken place. Training rosters and/or log sheets should be signed by employees and dated.



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I. CLOSURE PLANS AND POST-CLOSURE PLANS

I-1 Closure Plans

On Page I-5, the last paragraph must be revised to state an "independent registered professional engineer" will be used. (emphasis added)

I-1d(1) Closure of Containers: 724.278

Page I-8a states the cleanup level will be the appropriate "HCL". Define what is meant by a "HCL".

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

I-53 Financial Test and Corporate Guarantee for Closure: 724.243(f), 724.251(f)

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form. This form must also incorporate the latest closure costs.

Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

I-8 Liability Requirements: 703.183(g), 724.247

I-8(a)(2) Financial Test for Liability Coverage: 724.247(b)(2), 724.247(f)

The letter from the chief financial officer must be completed on an IEPA form. The letter submitted did not use the official IEPA form.



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Upon resubmittal, include a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statement for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required.

ALD:rd2544n/70-77

July 10, 1990

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
USA 62794-9276

Dear Mr. Eastep:

Re: Detrex Corporation Golds Shield Solvents
Part B Permit Application - Additional Information

On behalf of Detrex Corporation, please find enclosed four copies of additional information for inclusion in the RCRA Part B Permit Application for the Gold Shield Solvents facility located at 2537 LeMoyne Avenue in Melrose Park, Illinois (EPA I.D. Number ILD 074424938).

The information includes:

- 1) An amended Section C of the permit application to replace the existing Section C. The amended information includes the recently completed Laboratory Quality Assurance Project Plan;
- 2) A copy of the curricula vitae for Mr. Bill Moore for inclusion in Attachment H-3 to the permit application. Mr. Moore is the newly appointed corporate training director for Detrex Corporation; and
- 3) A revised letter signed by the chief financial officer in support of Detrex's use of the financial test for liability and closure coverage.

Reference was made in the May 23, 1990 response material provided to IEPA from CRA that the above noted material would be provided as soon as it became available.

RECEIVED

JUL 11 1990

IEPA-DLPC

July 10, 1990

Reference No. 2471

-2-

Should you have any questions, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Bruce McConnell, P.Eng.
BMC/cdd/3

Encl.

c.c. Mr. C.U. Guy
Mr. Dan Anderson



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311860003 -- Cook County
Gold Shield Solvents
ILD074424938
RCRA Permit Log No. 113

March 2, 1990

Mr. Jeffrey P. Philips, Branch Manager
Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

Dear Mr. Philips:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for one (1) hazardous waste container storage unit (S01) dated December 29, 1989 and received January 2, 1990 for the above-referenced facility. The Agency has determined that your RCRA Part B permit application is complete. We are now beginning the technical review of the application to assure the facility's conformance to the requirements of 35 Ill. Adm. Code Parts 703 and 724. A list of the deficiencies identified during this initial technical review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the technical review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 IAC Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than April 23, 1990. Failure to submit a complete response by that date may result in a Notice of Intent to Deny your application for permit pursuant to 35 IAC Part 705. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

(20)



Page 2

If you have any questions regarding this subject, feel free to contact Amy Dragovich of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

^{ALD}
LWE:ALD:dks/573n, 97-98

Enclosure

cc: Division File, w/enclosure
Maywood Region, w/enclosure
George Hamper, USEPA Region V, w/enclosure
Compliance Section
Ed Roberts, P.E.
Amy Dragovich, w/enclosure
Tim Murphy, RPMS, w/enclosure
Administrative Record, w/enclosure

Notice of Deficiencies
Initial Technical Review

Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

0311860003
ILD074424938
March 2, 1990

Detrex Corporation
Gold Shield Solvents
0311860003
ILD074424938
B-113
March 2, 1990

Subject Requirements: 35 Illinois Administrative Code Section Nos.

B. FACILITY DESCRIPTION

B-1 General Description: 703.183(a)

On Page B-5, the reference to 40 CFR Part 261 must be changed to 35 IAC Part 721.

B-2(a) General Map Requirements 703.183(s)

Attachment B-3 showing the surrounding area's topography is not very legible. Gold Shield Solvents must provide a legible copy of this map.

B-4 Traffic Information: 703.183(j)

Provide the load-bearing capacity for the concrete drive in the truck docking area.

B-5 Operating Record: 724.173

The application did not describe the information which will be documented in the operating records, nor did the facility describe how the operating records will be organized. Provide this information and include examples or copies of log sheets, etc.

C. WASTE CHARACTERISTICS

C-2 Waste Analysis Plan: 703.183(c), 724.113(b) and (c)

On page C-8, the references to 40 CFR must be changed to the appropriate references of 35 IAC.

C-2(a) Parameters and Rationale: 724.113(b)(1)

Visual characterizations should also be used to determine if the waste streams are physically consistent with previous samples of the same wastes. Such physical waste characterizations often include parameters such as color, percent liquids, percent solids, turbidity, number of phases, etc. These visual observations provide an immediate indication of deviations within a specific waste stream. Include as part of the waste analysis plan methods for physical evaluation of the waste streams generated at the site.

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C-2(b) Test Methods: 724.113(b)(2)

Test methods used to test for the parameters chosen should reference the EPA Test No. in SW-846 (Third Edition).

C-2(c) Sampling Methods: 724.113(b)(3)

The application does not specify in the sampling protocol a procedure for the collection of organic samples. This is important since care must be taken when collecting organic samples to ensure that air is not present in the sample. Samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method. Modify the sampling protocol in the waste analysis plan to address this issue.

The application must also specify what preservation techniques and maximum holding times will be used for sample handling and shipping prior to analysis.

The sampling protocol does not specify the location where the drums will be sampled. It is unclear if the drums will be sampled on the loading dock prior to transportation to the hazardous waste storage area. Clarify this issue. For wastes that are multi-layered, a discussion must be included explaining which layer(s) will be sampled.

The waste analysis plan must address what safety precautions will be taken during the sampling of hazardous waste.

C-2(d) Frequency of Analysis: 724.113(b)(4)

See Comment on Item C-2(c) above concerning composite samples.

C-2(e) Additional Requirements for Wastes Generated Off-Site: 724.113(c)

Page C-12, states that Gold Shield Solvents does not generate hazardous waste off-site, therefore, this section is not applicable. However, this section is intended for any waste generated off-site and brought to the facility. Modify the waste analysis plan to address this issue.

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C-2(g) Waste Analysis Requirements for Land Disposal Ban: 728.150

Since Gold Shield Solvents is storing hazardous wastes that are restricted from land disposal, the company must demonstrate that (1) the wastes are stored in containers, and (2) such storage is solely for the purpose of accumulating sufficient quantities of waste to facilitate proper treatment, recovery, or disposal.

These requirements do not apply to wastes that:

- (1) Meet the applicable treatment standards or prohibition levels; or
- (2) Are the subject of an approved petition under 728.106; or
- (3) Have received a nationwide variance; or
- (4) Have received a case-by-case extension under 728.105; or
- (5) Are the subject of a valid certification under 728.108.

If Gold Shield Solvents stores restricted wastes beyond one year, the facility must prove that such storage is solely for the purpose of accumulating sufficient quantities of waste to facilitate proper treatment, recovery, or disposal.

Gold Shield Solvents must also demonstrate that each container holding restricted wastes will be clearly marked to identify its contents and the date each period of accumulation begins.

C-3 Quality Assurance: 702.145

The application does not adequately address quality assurance procedures for laboratory protocol. Detection limits used for the different analytical methods must be specified. The application must also address the calibration frequency for the specific instrumentation used. In addition, the application must address "chain of custody" records, sample container labels and sampling analysis requests.

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D. PROCESS INFORMATION

D-1 Containers

D-1(a) Containers with Free Liquids

D-1a(2) Container Management Practices: 724.273

The aisle space of 2-feet for the container storage area is not sufficient to allow inspection of the containers. Provide a design drawing which demonstrates that the minimum aisle space will be sufficient to allow for inspection of containers. In addition, the minimum aisle space requirement also applies to the space between the walls of the facility and the rows of drums. Provide a design drawing which demonstrates that sufficient aisle space will be maintained between the walls of the storage area and the first row of drums.

A stacking height of three layers high (8' 7 1/2") is also not acceptable. The facility's or Agency's inspector is severely impaired in his/her inspection of the condition of a container if the container is at a height that is above the eye level of the inspector standing on the ground. Containers stacked higher than 6.5 feet would require the inspector to climb the stacks of hazardous waste possibly falling off or tipping the stacks. The use of a ladder to reach higher containers would hinder or deter satisfactory inspection of every container. Stacking no greater than a column of two drums or 6.5 feet, whichever has the greatest height, also helps protect workers from the dangers of handling hazardous waste during stacking operations in excessively high stacks.

D-1a(3) Requirements for the Base or Liner to Contain Liquids: 724.275(a)(1)

A typical untreated concrete surface is not sufficiently impervious to wastes stored at the facility, e.g., tetrachloroethylene. Provide information which demonstrates that an appropriate coating or sealant has been installed on the floor and sides of the secondary containment area to prevent migration of chemicals through the concrete. Demonstrate the coating is compatible with all wastes to be stored in the unit.

In addition, the height of the curbing at the security door on the north end of the building and the height of the concrete ramps to maintain secondary containment for the container storage area must be provided.

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D-1a(3)(d) Control of Run-on: 703.201(a)(4), 724.275(b)(4)

Drainage in the unloading/loading area is controlled via a catchbasin that discharges to the 18-inch diameter sewer system in front of the facility. In case of a spill in this area, describe what provisions are in-place to ensure that contaminated liquid is not discharged to the sewer system.

F. PROCEDURES TO PREVENT HAZARDS

F-2 Inspection Schedule

F-2(a) General Inspection Requirements: 703.183(c), 724.115(a) and (b), 724.133

The inspection report form should specify the number of telephones, fire extinguishers, eye washes and showers, respirators, etc., which are to be inspected in order to ensure that equipment or items are not overlooked simply because numbers were not specified. Modify the report form to include this information.

F-2(b) Specific Process Inspection Requirements

F-2(b)(1) Container Inspection: 724.274

The container inspection schedule should include an inventory of the number of containers which are stored in the container storage area. Containers must be inspected to ensure that they are closed and the accumulation dates on the hazardous waste labels should be observed. Aisle space must be visually evaluated to ensure that containers are not stored too close together and are not stored in the aisle ways. Revise the inspection schedule to address these deficiencies.

F-3 Waiver or Documentation of Preparedness and Prevention Requirements:

F-3a(1) Internal Communications: 724.132(a)

The locations of all internal communication equipment must be provided on a facility drawing.

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F-3a(2) External Communications: 724.132(b)

The locations of all external communication equipment must be provided on a facility drawing.

F-3a(3) Emergency Equipment: 724.132(c)

The list of emergency equipment must include safety goggles, gloves, and boots which are mentioned in the contingency plan. They must also be included in the inspection checklist, and their location identified on a facility plan.

F-3b Aisle Space Requirement: 724.135

The aisle space of 2-feet for the container storage area is not sufficient to allow inspection of the containers. In addition, the minimum aisle requirement also applies to the space between the walls of the facility and the rows of drums. Modify the container storage area to provide sufficient aisle space.

F-4 Preventive Procedures, Structures and Equipment: 703.183(h)

F-4e Personnel Protection Equipment: 703.183(h)(5)

The application does not describe in detail the procedures used to determine the type of personnel protective equipment which will be used to prevent exposure of personnel to hazardous waste. Provide this information.

G. CONTINGENCY PLAN

G-2 Emergency Coordinators: 724.152(d), 724.155

The primary coordinator listed in your Part B application is not normally at the site during operations of the facility. Revise the emergency coordinator list to include facility employees normally present at the site.

G-4 Emergency Response Procedures

G-4a Notification: 724.156(a)

Describe the methodology for immediate notification of facility personnel.

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G-5 Emergency Equipment: 724.152(e)

The location of the telephone/public address system, fire hydrant, safety goggles, gloves, and boots must be provided in Attachment G-2.

G-8 Required Reports: 724.156(j)

Describe the procedures which will be utilized to document in the operating record for the facility the time, date and details of any incident that requires implementation of the contingency plan.

The report mentioned on page G-20 of the application must be submitted to the DLPC Compliance Section within 15 days after the incident.

The Agency's Division of Land Pollution Control (DLPC) Compliance Section and Field Operations Section and the Illinois ESDA must be notified that clean-up operations have been completed and that emergency equipment has been cleaned and is fit for its intended use.

H. PERSONNEL TRAINING

H-1b Training Content, Frequency and Techniques: 724.116(c) and (d)(3)

The application did not provide specific information on the contents of the training program. The training program should provide in detail the information required for each job position (i.e., Drum Filling Station, Forklift and Hand Truck Operation, etc.).

H-1c Training Director: 724.116(a)(2)

The application did not demonstrate that the training director has been trained in hazardous waste management. Provide documentation that this individual has been trained in hazardous waste management.

H-1d Relevance of Training to Job Position: 724.116(a)(2)

The training program does not clearly show that all individuals are trained relevant to their job position. Since the Branch Manager and secretary serve as emergency coordinators, these people should be trained in safety and emergency equipment. The secretary's duties also include supervising hazardous waste drum sampling. Therefore, the warehouseman and secretary should both be trained in sampling procedures. Modify the training program to address these concerns.

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H-2 Implementation of Training: 724.116(b), (d)(4) and (e)

The application does not demonstrate that training has been successfully completed by facility personnel. Provide examples of log sheets or training rosters which are filled out to show training has taken place. Training rosters and/or log sheets should be signed by employees and dated.

I. CLOSURE PLANS AND POST CLOSURE PLANS

I-1 Closure Plans

I-1(a) Closure Performance Standard: 724.211

The closure plan does not adequately demonstrate that the container storage unit will be closed in a manner that minimizes the need for further maintenance and controls, and minimizes or eliminates to the extent necessary, the post-closure escape of hazardous waste, hazard constituents, leachate, contaminated runoff or hazardous waste decomposition products to the ground, surface waters or the atmosphere.

The following deficiency comments describe the additional detail required in the closure plan in order to demonstrate that the closure performance standard will be met.

I-1(d) Inventory Removal, Disposal or Decontamination of Equipment Structures and Soils: 724.212(b), 724.214

The closure plan must be revised to include the following:

1. The application does not discuss the procedures that will be used to determine if concrete cores will be required to prove that decontamination is complete and to determine the extent of soil sampling which may be required. Provide a statement (a) that the integrity of the containment systems will be investigated during closure and (b) that a comprehensive historical records review will be performed which includes wastes managed, management procedures, spill reports, inspection reports, repairs, etc.
2. Define the criteria which demonstrates the success of decontamination of the pad and equipment including the number of rinsate samples and concrete samples (if required). Provide the criteria.

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3. Provide a description of the decontamination or disposal methods for the pallets used to support the hazardous waste containers.

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

I-5e Financial Test and Corporate Guarantee for Closure: 724.243(f),
724.251(f)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. The letter from the chief financial officer must be completed on an IEPA form. Upon resubmittal, this form should also incorporate the updated closure costs.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding item.

I-8 Liability Requirements: 703.183(g), 724.247

I-8(a)(2) Financial Test for Liability Coverage: 724.247(b)(2), 724.247(f)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 724.251, a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 724.251 must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 724.251 is not required. The letter from the chief financial officer must be completed on an IEPA form.

AD:bjh/759n/24,33

PRIOR CONDUCT CERTIFICATION EVALUATION

Owner/Operator Name: _____ Social Security No. _____

Address: _____

Site Name: _____ Site Code _____

- I. Other hazardous waste sites owned or operated (anywhere) at anytime. (If more than one attach the name, address and nature of each site)

Site Name: _____ Site Code _____

Site Address: _____

- II. All of the following questions need to be answered. If the answer to any of the following is affirmative attach a copy of any final administrative or judicial determination.

- | | | |
|--|-----|----|
| 1) Have you ever violated any federal, state, or local laws, regulations or ordinances governing the operation of any waste disposal site? | YES | NO |
| 2) Have you ever been convicted in Illinois or any other state of any crime which is a felony under Illinois law or been convicted of a felony in a federal court? | YES | NO |
| 3) Have you ever been proven to have shown gross carelessness in the handling storing, processing, transporting or disposing of any hazardous waste in any state? | YES | NO |

- III. Is there any administrative or judicial proceeding, which is still pending, which:

- | | | |
|---|-----|----|
| 1) Could result in a determination of the type described in section II above; or | YES | NO |
| 2) Could result in the reversal of any administrative or judicial determination provided in response to section II above. | YES | NO |

If the answer to any of the above is yes provide a description including the name of the Agency or Court, title, docket No. and status.

CERTIFICATION STATEMENT

I certify under penalty of law that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Applicant

Title

Date

For Agency Use Only

Log No. PCC- _____
Final Action _____

Date Received: _____
Date: _____

LWE:jld/0412k/sp

COMPLETING THE FORM

As part of the IEPA review of Part B permit applications, the Illinois Environmental Protection Act (Sec. 39(i)) requires that an investigation of the owner/operators prior experience be conducted. Therefore any official representative of the applicant who is considered authorized to sign applications, must complete and submit the attached form. Those persons authorized to sign applications are identified in 35 IAC 702.106. In responding please identify all the authorized official representatives of the applicant, and their titles in a cover letter, and attach their completed prior conduct forms. For example, a corporation should identify the president, vice president, secretary and treasurer, and any other person who performs similar policy or decision making functions. Failure to comply with this request will result in a delay in the processing of a Part B, and may result in denial.

General: Provide the owner/operator's name, Social Security number, and address as well as the site name and site code. The site name should be the same as the name on the most recent operating permit.

Part I: Information on ownership and/or operation of other waste disposal sites, even if located in other states, must be provided. If more than one additional site is owned/operated, attach this information.

Part II: This part of the application deals with the operator's prior conduct, in other states as well as in Illinois. If there is any confusion on completing this part, the operator should attach a complete explanation as well as any supporting documentation. This part (and part III) applies to hazardous and non-hazardous facilities.

Part III. This part deals with pending actions which could impact the application. If final decisions are reached during the certification review it is the operator's responsibility to provide supplemental information within 30 days.

An original and two copies of all applications shall be submitted by registered or certified mail to:

Illinois Environmental Protection Agency
Division of Land Pollution Control - #24
Prior Conduct Certification Review
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

LE:/0412k.2.sp

DETREX CORPORATION

Solvents Division

2537 LeMoyne Ave.
Melrose Park, IL 60160



FAX: 708/345-3903

TELEPHONE:
708/345-3806

January 25, 1990

Mr. W. G. Robrecht
Detrex Corporation
P.O. Box 3111
Southfield, Michigan 48086-5111

Ms. Donna M. Cook
Detrex Corporation
Solvents Division
2537 Le Moyne
Melrose Park, IL 60160

I hereby attest to the fact that I have been trained in the hazards of the chemicals we handle here at Detrex Corporation - Solvents Division located at 2537 Le Moyne, Melrose Park, IL 60160 according to my job position and description. The training has consisted of the following:

Classroom instruction covering the solvents, hazardous material, use of the various solvents, emergency situations, and use of the emergency equipment. To supplement the above training we have slide/movie presentations and on the job supervised training of all operations.

Donna Cook

Secretary/Emergency Coordinator

Donna Cook

Michael Hagstrom

Account Manager

Michael Hagstrom

William Bast

Account Manager

William Bast

Dennis Butler

Truck Operator

Dennis Butler

Richard Fuentes

Truck Operator
Alternate Coordinator

Richard Fuentes

James Provenzano

Warehouseman

James Provenzano

Santa Czajka

Part Time Secretary

Santa Czajka

ANNUAL UPDATE

**RESPONSE TO IPEA
NOTICE OF DEFICIENCY**

B. FACILITY DESCRIPTION

B-2 Topographic Map: 703.183(s), 703.185(c), 703.185(d), 724.195, 724.197

B-2a General Map Requirements: 703.183(s)

Comment

The map must show the facility and a distance of 1,000 feet around it, at a scale of 1 inch equal to not more than 200 feet. The map must include: contours sufficient to show surface water flow around facility unit operations (2' contours), map date, 100-year floodplain area, surface waters, surrounding land uses, a wind rose, map orientation, and legal boundaries of facility site. The map should also indicate the location of access control, injection and withdrawal wells, buildings, structures, sewers, loading and unloading areas, fire control facilities, flood control or drainage barriers, run-off control systems, and (proposed) new and existing hazardous waste operation units and solid waste management units. Multiple maps may be submitted to meet the above requirements, if necessary, but should be at a scale of 1 inch equal to not more than 200 feet.

Response

A survey was conducted and a topographic map generated for the facility and the immediate vicinity (i.e 50 foot radius). This map was provided in Attachment B-2. This map illustrates all surface water flow patterns around the facility with contour lines provided at 0.5 foot intervals and corresponding surface water flow patterns indicated with directional arrows. An additional topographic map covering the facility and a distance of at least 1,000 feet around it is provided in Attachment B-3. The two topographic maps provide a clear indication of the surface water flow patterns around the Detrex Corporation facility. All other map requirements are provided elsewhere in the Permit Application.

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JAN 2 1990

IEPA-DLPC

B-4 Traffic Information: 703.183(j)

Comment

Provide the following traffic-related information:

- Traffic patterns on site;
- Estimated volumes, including number and types of vehicles;
- Traffic control signs, signal and procedures; and
- Adequacy of access roadway surfaces and load bearing capacity for expected traffic at the site

Response

The discussion on Page B-12 has been expanded to address the load bearing capacity for expected traffic at the site and the adequacy of access roadway surfaces.

C. WASTE CHARACTERISTICS

C-2 Waste Analysis Plan: 703.183(c), 724.113(b) and (c)

Comment

Provide a copy of the waste analysis plan that describes the methodologies for conducting the analyses required to properly treat, store, or dispose of hazardous wastes.

Response

The entire waste analysis plan in Section C-2 of the permit has been revised. The originally submitted plan contained some inconsistencies describing the waste sampling and analysis procedures followed by Detrex. In addition, a new Attachment C-2 has been provided which includes a sample laboratory report for each type of waste received at the Detrex facility.

C-2c Sampling Methods: 724.113(b) (3), 40 CFR 261 - Appendix I

Comment

List the sampling methods used to obtain a representative sample of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste.

Response

Section C-2c has been revised. The composite sampling procedure has been moved from former Attachment C-2 to this section for consistency. A glass thief is an appropriate sampling device for sampling liquid wastes from drums. The glass thief provides a representative sample of liquid wastes from throughout the drum to allow for proper characterization prior to recycling.

C-2e Additional Requirements for Wastes Generated Off-Site: 724.113(c)

Comment

Describe the procedures used to inspect and/or analyze a representative portion of wastes generated off-site. Describe the statistical method used to determine a representative sample of the incoming wastes (e.g. the number of drums to be sampled).

Response

Incoming wastes are analyzed per the frequency outlined in Section C-2d of the permit application and the analytical and sampling procedures outlined in Section C-2d and C-2e, respectively. To summarize here, a specific gravity test is conducted on a sample collected from each drum received at the facility. For new customers a gas chromatograph test is also conducted on a sample collected from each drum. For existing customers, a composite sample of up to a maximum of ten drums is analyzed by gas chromatograph. A flash point test is conducted as necessary based on the results of the gas chromatograph.

C-2f Additional Requirements for Ignitable, Reactive or Incompatible Wastes:
724.113(b) (6), 724.117

Comment

Describe the methods used to meet additional waste analysis requirements necessary for treating, storing, or disposing ignitable, reactive or incompatible wastes.

Response

As described in Section C-2f of the Permit Application, Detrex Corporation does not accept ignitable, reactive or incompatible wastes.

C-3 Quality Assurance: 702.145

Comment

Provide a quality assurance plan, in accordance with the standards established in the Third Edition of SW-846, for laboratory analysis of wastes and groundwater.

Response

A copy of a preliminary Quality Assurance Project Plan (QAPP) has been included as Attachment C-5. This QAPP is presently being rewritten by Detrex Corporation laboratory personnel. This document will be added to the permit in place of existing Attachment C-5, upon its completion.

D. PROCESS INFORMATION

D-1 Containers

D-1a Containers with Free Liquids

D-1a(1) Description of Containers: 724.271, 724.272

Comment

Provide the following information about the containers used to treat or store hazardous waste: approximate number of each type of container, construction materials demensions and usable volumes, DOT specifiications

or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings and labels.

Response

The discussion on page D-5 of the Permit Application has been expanded to address the required container information.

D-1a(2) Container Management Practices: 724.273

Comment

Describe container management practices used to ensure that hazardous waste containers are always kept closed during storage, except when adding, or removing or sampling waste, and are not opened, handled, or stored in a manner that may cause them to rupture or to leak. Include a discussion of procedures for transporting containers within the facility. Indicate the aisle space maintained between rows of containers and provide the maximum number, volume and stacking height of containers for each area in which containers are stored.

Response

The discussion on page D-6 of the Permit Application has been revised to indicate the minimum 2-foot aisle space maintained between rows of containers.

**D-1a(3) Secondary Containment System Design and Operation: 703.201(a) (1).
724.275(a) and (d)**

Comment

Provide design and profile drawings of the existing or planned container storage area(s), showing the secondary containment system and the arrangement of containers. Indicate on the drawings the areas in which incompatible wastes will be stored.

Response

This facility was constructed before Detrex Corporation began operating at the facility in 1974. A set of construction design and profile drawings of the facility are unavailable. All relevant information has been shown on facility drawings, throughout the Permit Application, that were prepared from a

survey. A figure showing the arrangement of containers in the container storage area has been added to Attachment D-3.

D-1a(3) (a) Requirement for the Base or Liner to Contain Liquids: 724.275(a) (1)

Comment

Demonstrate the capability of the base to contain liquids, including:

- **A statement that the base is free of cracks or gaps;**
- **Demonstration of imperviousness of base to wastes and precipitation;**
- **Base design and materials of construction;**
- **An engineering evaluation of the base's structural integrity; and**
- **Discussion of compatibility of the base with wastes.**

Response

The discussion on page D-7 of the Permit Application has been revised to include a discussion in the imperviousness nature of the concrete base and its compatibility with the wastes stored at the facility. As noted above, design drawings for the base are unavailable, however, it has performed adequately over the past 15 years. The building was constructed as an industrial building, therefore, based on general design standards, the concrete floor is assumed to be a minimum of five inches thick. A 5-inch thick concrete floor under the operational loads of the forklift in the facility provides a factor of safety of 1.44 for load bearing capacity. A discussion of this has been added to the text on page D-8.

D-1a(3) (b) Containment System Drainage: 703.201(a) (2), 724.275 (b) (2)

Comment

The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

Response

The containers within the container storage area are placed on wooden pallets to elevate them off the concrete floor. Adequate aisle space is maintained to allow for routine inspection. A discussion to this effect has been added to page D-8 of the Permit Application.

F PROCEDURES TO PREVENT HAZARDS

F-3 Waiver or Documentation of Preparedness and Prevention Requirements

F-3a Equipment Requirements: 703.183, 724.132

Comment

All facilities must be equipped with the following equipment unless the applicant can demonstrate that none of the hazards posed by waste handled at the facility could require that particular kind of equipment. Document that the facility possesses the equipment listed below and provide a description of its capabilities, capacity, etc., as appropriate. Note: The location of this equipment must be identified in the Contingency Plan (Item G-5).

Response

Appropriate equipment is provided at the facility. The location and description of the equipment is provided in the Permit Application.

F-3a(4) Water for Fire Control: 724.132(d)

Comment

Demonstrate that the facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

Response

The pressure in the watermain directly in front of the facility (ie. source for fire hydrant) is approximately 37 to 38 psi. This information was provided by the City Hall Water Works Engineering Department.

G. CONTINGENCY PLAN: 703.193(g), 724.150 through 724.156, 724.152 (b)

Comment

Provide a copy of the Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management to describe the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous

waste or hazardous waste constituents to air, soil, or surface water at the facility.

Response

Section G of the Permit Application [Contingency Plan] describes the actions facility personnel will take, under the direction of the Emergency Coordinator, in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

G-1 General Information

Comment

Provide the facility name and location, operator, site plan, and description of facility operations.

Response

Page G-6 has been revised to indicate Detrex Corporation as owner and operator of the facility.

G-6 Coordination Agreement Requirements: 724.137, 724.152(c)

Comment

Describe the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency. Document refusal to enter into a coordination agreement.

Response

A copy of the coordination agreements has been provided in Attachment G-3 and the text on page G-18 has been amended appropriately. This has resulted in original Attachment G-3 (Evacuation Routes) being changed to Attachment G-4 and page G-19 also being amended appropriately.

H. PERSONNEL TRAINING: 703.183(1), 724.116

H-1 Outline of the Training Program: 724.116(a) (1)

Comment

Provide an outline of both the introductory and continuing training program by owners or operators to prepare personnel to operate or maintain the facility in a safe manner. Include a brief description on how training will be designed to meet actual job tasks. Note: On-the-job training may be used to comply with these requirements.

Response

A brief outline of the training program has been added on page H-5.

H-1c Training Director: 724.116(a) (2)

Comment

Demonstrate that the program is directed by a person trained in hazardous waste management.

Response

The training director for the facility personnel training program is Mr. Stan Miles. A discussion of his qualifications has been added to page H-6 of the Permit Application.

H-1e Training of Emergency Response: 724.116(a) (3)

Comment

Demonstrate that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems. The training program should include the following, if applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems

- Communications or alarm systems
- Response to groundwater contamination incidents
- Shutdown of operations

Response

Section H-1e has been expanded to briefly describe the emergency response actions that facility personnel are trained for by this training program. It should be noted that there are no automatic waste feed cut-off systems or other operations requiring shut-down in an emergency situation.

I. CLOSURE AND POST-CLOSURE REQUIREMENTS: 703.183(m), 724.210 through 724.220

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

Comment

Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following:

I-5a Closure Trust Fund: 724.243(a), 40 CFR 264.151(a) (1)

Comment

Provide a copy of the closure trust fund agreement with the working required by 40 CFR 264.151(a) (1) and a formal certification of acknowledgement.

Response

Detrex Corporation has provided in Attachment I-4 of the Permit Application the relevant information to demonstrate that it meets the financial test requirements. However, a completed copy of the standardized form required by 35 IAC 724.251 was not completed with the original application. This completed form will be submitted as soon as possible (see cover letter).

I-5b Surety Bond: 724.243(b) and (c), 724.251(b) and (c)

**I-5b (1) Surety Bond Guaranteeing Payment Into a Closure Fund: 724.253 (b)
40 CFR 264.15 (b)**

Comment

Provide a copy of the surety bond with the wording required by 40 CFR 264.151 (b) and a copy of the standby trust agreement. The bond must guarantee that the owner or operator will fund the standby trust fund in an amount equal to the penal sum of the bond before the beginning of final closure of the facility, or fund the standby trust fund in an amount equal to the penal sum within 15 days of an order to begin closure, or provide alternate financial assurance if the bond is cancelled.

Response

See response to comment I-5a.

**I-5b (2) Surety Bond Guaranteeing Performance of Closure:
724.243 (c) 40 CFR 264.15 (c)**

Comment

Provide a copy of the irrevocable letter of credit with the wording required by 40 CFR 264.15 (d) and a copy of the standby trust agreement. The letter of credit must be issued for a period of least one year and be for the amount of estimated closure.

Response

See response to comment I-5a

I-5c Closure Letter of Credit: 724.243 (d), 40 CFR 264.151 (d)

Comment

Provide a copy of the irrevocable letter of credit with the wording required by 40 CFR 264.15 (d) and a copy of the standby trust agreement. The letter of credit must be issued for a period of at least one year and be for the amount of estimated closure.

Response

See response to comment I-5a.

I-5d Closure Insurance: 724.243 (e), 40 CFR 264.151 (e)

Comment

Provide a copy of the certificate of insurance with the wording in 40 CFR 264.151 (e).

Response

See response to I-5a.

**I-5e Financial Test and Corporate Guarantee for Closure: 724.243 (f)
724.251 (f), 40 CFR 264.151 (h)**

Comment

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.15 (f), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding items.

Response

See response to comment I-5a.

I-5g Use of Financial Mechanism for Multiple Facilities: 724.243 (h)

Comment

Provide a copy of a financial assurance mechanism for more than one facility showing, for each facility, the EPA ID number, name, address, and amount of funds closure assured by the mechanism. The amount of funds available through the mechanism must be no less than the sum of funds that would be available if a separate mechanism had been established and maintained for each facility.

Response

See response to I-5a.

I-8 Liability Requirements: 703.183 (q) 724.247

Comment

Provide copies of the required items documenting compliance with applicable liability requirements for sudden and nonsudden accidental occurrences.

Response

See response to comment I-5a.

I-8a Coverage for Sudden Accidental Occurrences: 724.247 (a)

Comment

Liability coverage must be maintained for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. Liability coverage may be demonstrated in one of three ways:

Response

See response to comment I-5a.

I-8a(1) Endorsement or Certification: 724.247 (a) (1)

Comment

Submit a signed duplicate original of the Hazardous Waste Facility Liability Endorsement, with the wording specified by 724.251 (i), or of a Certificate of Liability Insurance, with the wording specified by 40 CFR 264.15 (j).

Response

See response to comment I-5a.

I-8a(2) Financial Test for Liability Coverage: 724.247 (a) (2), 724.247 (f)

Comments

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.15 (g), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 40 CFR 264.151 (g) must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 40 CFR 264.151 (f) is not required.

Response

See response to comment I-5a.

I-8a(3) Use of Multiple Insurance Mechanism: 724.247 (a) (3))

Comments

Submit items demonstrating required liability coverage through a combination of endorsement or certification and financial test as these mechanisms are specified in this section (see I-8a (1) and I-8a (2)). The amounts of coverage demonstrated must total at least the minimum amounts required by 264.147 (a).

Response

See response to comment I-5a.

K PART B CERTIFICATION: 703.182

K-2 Engineering Certification 703.182, Illinois Professional Engineering Act

Comments

Technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a Professional Engineer who is licensed to practice in the State of Illinois in accordance with Illinois Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1.

Response

There are no technical data, design drawings, specifications or engineering studies included in this Permit Application that require certification by a licensed Professional Engineer.

Log 113-Part B

USEPA

CRA
Consulting Engineers

CONESTOGA-ROVERS & ASSOCIATES LIMITED

651 Colby Drive,
Waterloo, Ontario, Canada N2V 1C2
(519) 884-0510

December 29, 1989

Reference No. 2471

Mr. Lawrence W. Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control - #24
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois
USA 62794-9276

RECEIVED
PAF - 1/9/90

Dear Mr. Eastep:

Re: Detrex Corporation Gold Shield Solvents
RCRA Part B Permit Application
ILD 07442493

On behalf of Detrex Corporation, please find enclosed the original and three (3) copies of the new information and certification provided in response to the IEPA Notice of Deficiencies (NOD) dated December 14, 1988.

Also find enclosed, a table that provides details on how to incorporate this new information into the existing Part B Permit Application submitted November 8, 1988 and a response that addresses each IEPA comment individually.

The standardized form required for demonstration of the financial test has not been provided in this submission. However, an updated closure cost estimate and financial statement has been provided. Ms. Amy Dragovich of your staff has provided a copy of the necessary forms directly to Detrex Corporation. This form will be completed and submitted to IEPA as soon as possible for inclusion in the Part B Permit Application. This was discussed with Ms. Dragovich.

Should you have any questions or require additional information, do not hesitate to contact Mr. C. U. Guy (Manager of Environmental Compliance) at 212-997-6131, or the undersigned, at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES


Ed Roberts, P. Eng.

ER/JO
Encl.

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RECEIVED

JAN 2 1990

IEPA-DLPC

113 Park B



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311860003 -- Cook County
Gold Shield Solvents
ILD074424938
RCRA Permit Log B113
Certified Mail # *P 115 235 972*

November 1, 1989

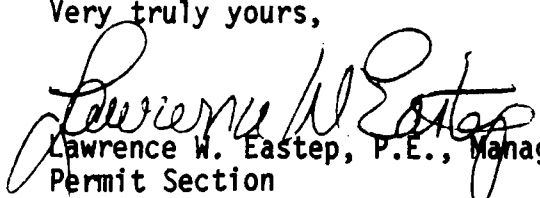
Mr. Jeffrey P. Philips
Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

Dear Mr. Philips:

The purpose of this letter is to remind you that your revised RCRA Part B permit application is due January 1, 1990. Unless we receive your revised application by January 1, 1990, the Agency will begin the process of terminating interim status for your facility pursuant to 35 IAC 703.157(b). This would require closure of your RCRA hazardous waste management unit(s).

If you have any questions, contact Charlie Zeal at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CAZ:rd3813k/39

cc: Division File
Maywood Region
Compliance Section
Enforcement
USEPA Region V, George Hamper ✓
Jim Moore



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311860003 -- Cook County
Gold Shield Solvents (Detrex)
ILD074424938
RCRA Permit Log No. 113

DETREX

December 14, 1988

Mr. Jeffrey P. Philips, Branch Manager
Detrex Corporation
Gold Shield Solvents
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

Dear Mr. Philips:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for one (1) hazardous waste container storage unit (S01) dated November 7, 1988 and received November 8, 1988 for the above-referenced facility. A list of the deficiencies identified during this initial completeness review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the completeness review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 IAC Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than January 1, 1990. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

In order for the Agency to determine that they have received a complete application, each page of the application must be sequentially numbered. Therefore, a revised application with each page numbered must be submitted in response to this Notice of Deficiency.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276



Page 2

If you have any questions regarding this subject, feel free to contact Amy Dragovich of my staff at 217/782-6762.

Very truly yours,

Lawrence W Eastep by az

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

^{ALD}
LWE:ALD:rlc/3759j,99-100

Enclosure

cc: Division File, w/enclosure
Maywood Region, w/enclosure
George Hamper, USEPA Region V, w/enclosure
Mary Murphy, USEPA Region V
Compliance Section
Ed Roberts, P.E., Conestoga-Rovers and Associates Limited, w/enclosure
Amy Dragovich, w/enclosure

Notice of Deficiencies
Initial Completeness Review

Detrex Corporation
Gold Shield Solvents
2537 LeMoyn Avenue
Melrose Park, Illinois 60160

0311860003
ILD074424938
December 14, 1988

B. FACILITY DESCRIPTION

B-2 Topographic Map: 703.183(s), 703.185(c), 703.185(d), 724.195, 724.197

B-2a General Map Requirements: 703.183(s)

The map must show the facility and a distance of 1,000 feet around it, at a scale of 1 inch equal to not more than 200 feet. The map must include: contours sufficient to show surface water flow around facility unit operations (2' contours), map date, 100-year floodplain area, surface waters, surrounding land uses, a wind rose, map orientation, and legal boundaries of facility site. The map should also indicate the location of access control, injection and withdrawal wells, buildings, structures, sewers, loading and unloading areas, fire control facilities, flood control or drainage barriers, run-off control systems, and (proposed) new and existing hazardous waste operation units and solid waste management units. Multiple maps may be submitted to meet the above requirements, if necessary, but should be at a scale of 1 inch equal to not more than 200 feet.

B-4 Traffic Information: 703.183(j)

Provide the following traffic-related information:

- . Traffic patterns on site;
- . Estimated volumes, including number and types of vehicles;
- . Traffic control signs, signals and procedures; and
- . Adequacy of access roadway surfaces and load bearing capacity for expected traffic at the site.

C. WASTE CHARACTERISTICS

C-2 Waste Analysis Plan: 703.183(c), 724.113(b) and (c)

Provide a copy of the waste analysis plan that describes the methodologies for conducting the analyses required to properly treat, store, or dispose of hazardous wastes.

C-2c Sampling Methods: 724.113(b)(3), 40 CFR 261 - Appendix I

List the sampling methods used to obtain a representative sample of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste.

C-2e Additional Requirements for Wastes Generated Off-Site: 724.113(c)

Describe the procedures used to inspect and/or analyze a representative portion of wastes generated off-site. Describe the statistical method used to determine a representative sample of the incoming wastes (e.g. the number of drums to be sampled).

C-2f Additional Requirements for Ignitable, Reactive or Incompatible Wastes:
724.113(b)(6), 724.117

Describe the methods used to meet additional waste analysis requirements necessary for treating, storing, or disposing ignitable, reactive or incompatible wastes.

C-3 Quality Assurance: 702.145

Provide a quality assurance plan, in accordance with the standards established in the Third Edition of SW-846, for laboratory analysis of wastes and groundwater.

D. PROCESS INFORMATION

D-1 Containers

D-1a Containers with Free Liquids

D-1a(1) Description of Containers: 724.271, 724.272

Provide the following information about the containers used to treat or store hazardous waste: approximate number of each type of container, construction materials, dimensions and usable volumes, DOT specifications or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings and labels.

D-1a(2) Container Management Practices: 724.273

Describe container management practices used to ensure that hazardous waste containers are always kept closed during storage, except when adding, or removing or sampling waste, and are not opened, handled, or stored in a manner that may cause them to rupture or to leak. Include a discussion of procedures for transporting containers within the facility. Indicate the aisle space maintained between rows of containers and provide the maximum number, volume and stacking height of containers for each area in which containers are stored.

D-1a(3) Secondary Containment System Design and Operation: 703.201(a)(1), 724.275(a) and (d)

Provide design and profile drawings of the existing or planned container storage area(s), showing the secondary containment system and the arrangement of containers. Indicate on the drawings the areas in which incompatible wastes will be stored. Note that the secondary containment system requirements also apply to storage areas holding wastes F020, F021, F022, F023, F026 and F027, whether or not these wastes contain free liquids.

D-1a(3)(a) Requirement for the Base or Liner to Contain Liquids: 724.275(a)(1)

Demonstrate the capability of the base to contain liquids, including:

- . A statement that the base is free of cracks or gaps;
- . Demonstration of imperviousness of base to wastes and precipitation;
- . Base design and materials of construction;
- . An engineering evaluation of the base's structural integrity; and
- . Discussion of compatibility of the base with wastes.

D-1a(3)(b) Containment System Drainage: 703.201(a)(2), 724.275(b)(2)

The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

F PROCEDURES TO PREVENT HAZARDS

F-3 Waiver or Documentation of Preparedness and Prevention Requirements

F-3a Equipment Requirements: 703.183, 724.132

All facilities must be equipped with the following equipment unless the applicant can demonstrate that none of the hazards posed by waste handled at the facility could require that particular kind of equipment. Document that the facility possesses the equipment listed below and provide a description of its capabilities, capacity, etc., as appropriate. Note: The location of this equipment must be identified in the Contingency Plan (Item G-5).

F-3a(4) Water for Fire Control: 724.132(d)

Demonstrate that the facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

G. CONTINGENCY PLAN: 703.183(g), 724.150 through 724.156, 724.152(b)

Provide a copy of the Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management to describe the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

G-1 General Information

Provide the facility name and location, operator, site plan, and description of facility operations.

G-6 Coordination Agreement Requirements: 724.137, 724.152(c)

Describe the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency. Document refusal to enter into a coordination agreement.

H. PERSONNEL TRAINING: 703.183(1), 724.116

H-1 Outline of the Training Program: 724.116(a)(1)

Provide an outline of both the introductory and continuing training programs by owners or operators to prepare personnel to operate or maintain the facility in a safe manner. Include a brief description on how training will be designed to meet actual job tasks. Note: On-the-job training may be used to comply with these requirements.

H-1c Training Director: 724.116(a)(2)

Demonstrate that the program is directed by a person trained in hazardous waste management.

H-1e Training for Emergency Response: 724.116(a)(3)

Demonstrate that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems. The training program should include the following, if applicable:

- . Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- . Key parameters for automatic waste feed cut-off systems
- . Communications or alarm systems
- . Response to fires
- . Response to groundwater contamination incidents
- . Shutdown of operations

I. CLOSURE AND POST-CLOSURE REQUIREMENTS: 703.183(m), 724.210 through 724.220

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following:

I-5a Closure Trust Fund: 724.243(a), 40 CFR 264.151(a)(1)

Provide a copy of the closure trust fund agreement with the wording required by 40 CFR 264.151(a)(1) and a formal certification of acknowledgement.

I-5b Surety Bond: 724.243(b) and (c), 724.251(b) and (c)

I-5b(1) Surety Bond Guaranteeing Payment Into a Closure Fund: 724.253(b),
40 CFR 264.151(b)

Provide a copy of the surety bond with the wording required by 40 CFR 264.151(b) and a copy of the standby trust agreement. The bond must guarantee that the owner or operator will fund the standby trust fund in an amount equal to the penal sum of the bond before the beginning of final closure of the facility, or fund the standby trust fund in an amount equal to the penal sum within 15 days of an order to begin closure, or provide alternate financial assurance if the bond is cancelled.

I-5b(2) Surety Bond Guaranteeing Performance of Closure: 724.243(c), 40 CFR
264.151(c)

Provide a copy of the surety bond with the wording required by 40 CFR 264.151(c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart G.

I-5c Closure Letter of Credit: 724.243(d), 40 CFR 264.151(d)

Provide a copy of the irrevocable letter of credit with the wording required by 40 CFR 264.151(d) and a copy of the standby trust agreement. The letter of credit must be issued for a period of at least one year and be for the amount of estimated closure.

I-5d Closure Insurance: 724.243(e), 40 CFR 264.151(e)

Provide a copy of the certificate of insurance with the wording required in 40 CFR 264.151(e).

I-5e Financial Test and Corporate Guarantee for Closure: 724.243(f),
724.251(f), 40 CFR 264.151(h)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(f), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding items.

I-5g Use of Financial Mechanism for Multiple Facilities: 724.243(h)

Provide a copy of a financial assurance mechanism for more than one facility showing, for each facility, the EPA ID number, name, address, and amount of funds closure assured by the mechanism. The amount of funds available through the mechanism must be no less than the sum of funds that would be available if a separate mechanism had been established and maintained for each facility.

I-8 Liability Requirements: 703.183(q), 724.247

Provide copies of the required items documenting compliance with applicable liability requirements for sudden and nonsudden accidental occurrences.

I-8a Coverage for Sudden Accidental Occurrences: 724.247(a)

Liability coverage must be maintained for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. Liability coverage may be demonstrated in one of three ways:

I-8a(1) Endorsement or Certification: 724.247(a)(1)

Submit a signed duplicate original of the Hazardous Waste Facility Liability Endorsement, with the wording specified by 724.251(i), or of a Certificate of Liability Insurance, with the wording specified by 40 CFR 264.151(j).

I-8a(2) Financial Test for Liability Coverage: 724.247(a)(2), 724.247(f)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(g), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 40 CFR 264.151(g) must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 40 CFR 264.151(f) is not required.

I-8a(3) Use of Multiple Insurance Mechanisms: 724.247(a)(3)

Submit items demonstrating required liability coverage through a combination of endorsement or certification and financial test as these mechanisms are specified in this section (see I-8a(1) and I-8a(2)). The amounts of coverage demonstrated must total at least the minimum amounts required by 264.147(a).

K. PART B CERTIFICATION: 703.182

K-2 Engineering Certification: 703.182, Illinois Professional Engineering Act

Technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a Professional Engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1.

AD:sf/sp/3868j,1-5



217/782-6761

Refer to: # 0311860003 -- Cook County
Gold Shield Solvents
ILD 074424936
RCRA - Permits

May 6, 1988

Gold Shield Solvents
2537 Lemoyne Avenue
Melrose Park, Illinois 60160

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-726. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 726, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



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In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 6, 1986 or (2) close by November 6, 1986. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 6, 1986. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 6, 1986. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 6, 1986, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



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The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19176
Springfield, IL 62716-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-5875.

Very truly yours,

Lawrence H. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LHE:JRH/1230/1244/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

